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11
12 **UNITED STATES DISTRICT COURT**
13 **SOUTHERN DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**

15 SECURITIES AND EXCHANGE
COMMISSION,

16 Plaintiff,

17 v.

18 STEVE CHEN, USFIA, INC.,
19 ALLIANCE FINANCIAL
GROUP, INC., AMAUCTION, INC.,
20 ABORELL MGMT I, LLC, ABORELL
21 ADVISORS I, LLC, ABORELL
REIT II, LLC, AHOME REAL
22 ESTATE, LLC, ALLIANCE
NGN, INC., APOLLO REIT I, INC.,
23 APOLLO REIT II, LLC, AMKEY, INC.,
24 US CHINA CONSULTATION
ASSOCIATION, and QUAIL RANCH
25 GOLF COURSE, LLC,

26 Defendants.
27
28

Case No. 2:15-cv-07425 RGK PLA

**FIRST INTERIM FEE
APPLICATION OF ALLEN
MATKINS LECK GAMBLE
MALLORY & NATSIS, GENERAL
COUNSEL TO THE RECEIVER FOR
PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES**

Date: May 2, 2016
Time: 9:00 a.m.
Ctm.: 850
Judge: Hon. R. Gary Klausner

Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), general counsel to Thomas A. Seaman ("Receiver"), the Court-appointed permanent receiver for Defendants USFIA, Inc., Alliance Financial Group, Inc., Amauction, Inc., Aborell Mgmt I, LLC, Aborell Advisors I, LLC, Aborell REIT II, LLC, Ahome Real Estate, LLC, Alliance NGN, Inc., Apollo REIT I, Inc., Apollo REIT II, LLC, Amkey, Inc., US China Consultation Association, Quail Ranch Golf Course, LLC, and their subsidiaries and affiliates (collectively, "Receivership Entities"), hereby submits this first interim application for approval and payment of fees and reimbursement of expenses ("Application"). This Application covers the period from the Receiver's appointment on September 29, 2015, through December 31, 2015 ("First Application Period"), and seeks interim approval of \$194,607.90 in fees and \$9,755.22 in expenses, and an order authorizing the Receiver to pay, on an interim basis, 80% of fees incurred (\$155,686.32) and 100% of expenses incurred.

I. INTRODUCTION

This receivership involves a complex and wide ranging group of enterprises and assets which appear to have been funded with the fruits of the fundraising scheme at the heart of the action filed by the Securities and Exchange Commission ("Commission"). The Receiver was appointed on a temporary basis on September 29, 2015, and on a permanent basis on October 6, 2016.

The appointment orders confer broad duties, responsibilities, and powers on the Receiver that are designed to allow him to secure, preserve, and protect the assets of the Receivership Entities, investigate and recover sums transferred to third parties, conduct a forensic accounting and analysis of the Receivership Entities' financial transactions, review and analyze investor claims, and maximize the amount ultimately available for distribution to investors. The appointment orders also authorize the Receiver to engage counsel to assist him in the performance of his duties. The Receiver promptly determined that experienced, qualified counsel was

critical due to the size and complexity of the receivership estate. Accordingly, the Receiver engaged Allen Matkins to assist with urgent legal issues facing the receivership estate and the firm immediately began work, including assisting with the takeover of the enterprises and securing their assets.

This fee application should be read in conjunction with the Receiver's First Interim Report ("First Report") and Second Interim Report ("Second Report") filed on November 13, 2015, and February 26, 2016, respectively, which describe in detail the Receiver's activities during the First Application Period. Dkt. Nos. 19 and 53. So as to avoid repetition, references are made to relevant portions of the First Report and Second Report in the below descriptions of Allen Matkins' work.

This Application seeks interim approval of \$194,607.90 in fees for a total of 404.30 hours worked, and payment on an interim basis of 80% of that amount, or \$155,686.32. The work performed is described task-by-task in Exhibit A and is broken down into the following categories:

Matter	Hours	Amount
General Receivership	44.30	\$20,085.75
Asset Investigation & Recovery	233.00	\$109,654.20
Reporting	19.00	\$9,916.65
Investor Communications	1.20	\$529.20
Operations and Asset Sales	4.40	\$2,151.45
Pending Litigation	12.10	\$7,055.55
Third Party Claims	90.30	\$45,215.10
TOTAL	404.30	\$194,607.90

The initial phase of a complex equity receivership always involves substantial work by the receiver and professionals to (a) identify and secure cash, real property, and other assets, (b) preserve their value, (c) investigate and pursue recovery of funds disbursed from the Receivership Entities' accounts, (d) address operational and employee issues, (e) gather and review key documents, and (f) advise the Court on the status of the Receiver's activities. As these types of receiverships progress,

1 fees and costs generally decline as operations are stabilized, assets are secured and
2 protected, and procedures for the efficient administration of the receivership are put
3 in place.

4 In this instance, the receivership estate includes a large number of affiliated
5 entities with substantial cash and real property assets. In addition, there are a large
6 number of transfers to third parties that occurred prior to the Receiver's
7 appointment. These two categories of work - Asset Investigation & Recovery and
8 Third Party Claims - represent approximately 80% of the fees incurred in the First
9 Application Period. The next largest category – General Receivership – includes
10 time spent on reviewing pleadings and evidence filed in the case, interactions with
11 the Securities and Exchange Commission ("Commission"), other government
12 agencies, and counsel for Defendant Steve Chen ("Chen"), responding to document
13 requests from the United States Attorney's Office, and implementing the Court's
14 Preliminary Injunction Order. Accordingly, although the fees for the First
15 Application Period are significant, much of the work was on non-recurring tasks
16 associated with implementing the Court's orders, investigating and securing assets,
17 and stabilizing operations.

18 Allen Matkins has worked diligently and efficiently to assist the Receiver
19 with urgent legal issues facing the receivership estate through the turbulent
20 transition from a large, active enterprise to a Court-ordered receivership. The firm's
21 work has allowed the Receiver to preserve and protect the substantial value of
22 receivership estate assets, including approximately \$27 million in cash, an office
23 building, hotel, apartment building, three residential properties, vacant golf course
24 land in the Morena Valley, automobiles, jewelry, high caliber firearms, and various
25 other items of personal property.

26 The efforts of the Receiver and Allen Matkins in investigating and pursuing
27 recoveries from third parties have already resulted in recovery of significant sums,
28 including \$702,000 recovered to date from law firms. Allen Matkins also assisted in

1 successfully overcoming the motion of Li Zhao, a former employee and the mother
 2 of Chen's son, to unfreeze and remove more than \$3 million from the receivership
 3 estate. The firm has worked diligently to assist the Receiver in carrying out his
 4 Court-ordered duties and should be compensated on an interim basis for its work.

5 **II. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED**

6 **A. Categories and Descriptions of Work**

7 **1. General Receivership**

8 Allen Matkins' work in the General Receivership category initially focused on
 9 review and analysis of key orders and pleadings, the voluminous evidence filed by
 10 the Commission, and case materials, as well as interaction with attorneys for the
 11 Commission, other government agencies, and counsel for the Defendant Steve
 12 Chen. This work was necessary to advise the Receiver on legal issues relating to the
 13 scope of the receivership, the duties and powers conferred on him by the Court, and
 14 the effect of other key provisions of the Court's orders.

15 In addition, as required under 28 U.S.C. section 754, Allen Matkins assisted
 16 the Receiver in promptly filing the Complaint, TRO, and Preliminary Injunction
 17 Order ("PI Order") in other judicial districts in which the Receivership Entities' own
 18 assets. Specifically, the documents were filed in the Northern, Eastern, and
 19 Southern Districts of California, as well as the District of Nevada. Allen Matkins
 20 also assisted the Receiver in recording the PI Order in the county property records
 21 for all counties in which the Receivership Entities own real property such that a title
 22 search will show the PI Order.

23 Allen Matkins assisted in reviewing document requests from the United
 24 States Attorney's Office, gathering and reviewing responsive documents, and
 25 producing such documents. The firm also reviewed and responded to inquiries from
 26 the California Department of Business Oversight ("CDBO") regarding a Desist and
 27 Refrain Order issued to USFIA, Inc. as well as discovery requests issued by the
 28

1 CDBO. The reasonable and necessary fees for Allen Matkins' work in this category
2 total \$20,085.75.

3 2. Asset Investigation and Recovery

4 As is to be expected at the outset of a complex equity receivership involving
5 numerous entities, the largest category of work during the initial phase of the
6 receivership is investigating and recovering assets. Here, the large number of
7 entities, bank accounts, transfers between and among entities and third parties,
8 foreign affiliates, outside professionals engaged, real properties,
9 jewelry/beads/gemstones, automobiles, and firearm purchases required substantial
10 investigation, gather and review of relevant documents, analysis of assets and
11 claims, and recovery efforts. As is often the case in large enterprises involving
12 allegations of fraud, there were very few records or files maintained by the
13 Receivership Entities, requiring the Receiver to essentially gather records and
14 investigate assets from scratch.

15 Allen Matkins assisted with the takeover, including interviewing employees
16 and other witnesses present at the USFIA office building in Arcadia and reviewing
17 documents located at the office premises. The firm issued numerous notices of the
18 TRO and Preliminary Injunction Order to third parties, as well as letters demanding
19 the turnover of assets and records.

20 The very large project of investigating assets, transfers to third parties, and
21 potential claims to recover assets comprises the largest part of Allen Matkins' work
22 during the First Application Period and includes the following tasks:

- 23 • Reviewing documents found at the Receivership Entities' locations;
- 24 • Issuing 47 subpoenas, notices, and demand letters to financial institutions,
25 transferees, employees, former counsel and accountants, and other
26 witnesses;
- 27 • Providing formal notification of the receivership to all known transferees
28 and making demands for the return of funds and/or assets;

- 1 • Gathering, organizing, and reviewing documents and information obtained
- 2 in response to approximately 23 different subpoenas and demands;
- 3 • Tracking the status of subpoenas and follow-up communications to ensure
- 4 full and timely production of documents;
- 5 • Scheduling and preparing for meetings with employees, transferees, and
- 6 other witnesses;
- 7 • Interviewing approximately 35 employees, transferees, and other
- 8 witnesses;
- 9 • Investigating the ultimate destination of funds transferred and researching
- 10 the ownership and control of various entities, both in the U.S. and abroad,
- 11 through which transferred funds were funneled;
- 12 • Analyzing and evaluating claims and recovery strategies;
- 13 • Analyzing the potential value and recoverability of hard assets, including
- 14 automobiles, firearms, and jewelry/gemstones;
- 15 • Researching and analyzing legal defenses raised by counsel for certain
- 16 transferees; and
- 17 • Negotiating and corresponding with various transferees and their counsel.

18 The investigation was particularly challenging and time consuming because,
19 as noted above, the Receivership Entities did not maintain any files for the
20 numerous transactions. Accordingly, documents and information had to be gathered
21 and files had to be created from scratch. The investigation and recovery efforts
22 were further complicated by the fact that certain transferees, upon being contacted,
23 took an adversarial position and hired defense counsel, rather than agreeing to
24 provide documents on an informal basis or to be interviewed. Accordingly,
25 subpoenas had to be issued and communications handled by counsel, adding
26 considerable expense and delay.

27 Language barriers also presented a challenge in investigating certain
28 investments and transfers, many of which went to Chinese-Americans located in the

1 United States. Fortunately, Allen Matkins attorney Tim Hsu is fluent in Mandarin
2 and was able to converse with certain Chinese-American transferees and translate
3 documents written in Mandarin for the Receiver.

4 Significant time was also spent investigating the relationships and affiliation
5 between Li Zhao ("Zhao"), Ally Investors ("Ally"), Chen, and the Receivership
6 Entities, including transfers between and among them, transfers from them to third
7 parties, payments of personal expenses, purchases of real and personal property, and
8 related matters. The claims asserted by Zhao and the Receiver's response to those
9 claims are discussed below in the Third Party Claims section. In addition to
10 gathering documents necessary to overcome those claims, the investigative work
11 revealed that the Receivership Entities purchased a property located at
12 2857 Gainsborough Drive, San Marino, California ("Gainsborough Property") for
13 \$2,335,000, but title to the property was taken in Zhao's name. As noted in the
14 Second Report, the Receiver has demanded that Zhao turn over the Gainsborough
15 Property, but, for the time being, Zhao and the Receiver have agreed to try and reach
16 a global resolution of issues and have agreed to defer such discussions until the
17 Receiver has performed additional accounting work.

18 The reasonable and necessary fees for work in this category during the First
19 Application Period total \$109,654.20.

20 3. Reporting

21 Allen Matkins' work in this category during the First Application Period
22 focused on preparing the Receiver's First Report. Dkt. No. 19. The First Report,
23 filed on November 13, 2015, provided a summary of the Receiver's activities,
24 including actions to implement the TRO and PI Order, efforts to recover
25 receivership assets, documents and records, and his initial assessment of the
26 Receivership Entities' operations. The First Report also provided a summary of the
27 real and personal property assets of the Receivership Entities, affiliated entities,
28 based on the Receiver's preliminary investigation. Finally, the First Report provided

1 an initial accounting of receipts and disbursements, as well as the Receiver's initial
2 recommendations for proceeding with the receivership. The reasonable and
3 necessary fees for work in this category total \$9,916.65.

4 4. Investor Communications

5 This category includes time spent addressing notices to investors, changes to
6 the receivership website, and responses to direct investor inquiries. The reasonable
7 and necessary fees for work in this category total \$529.20.

8 5. Sale of Assets/Disposition

9 This category contains time spent on operational issues relating to the
10 Receivership Entities, including insurance policy issues and termination of a lease at
11 the USFIA office building. The reasonable and necessary fees for work in this
12 category total \$2,151.45.

13 6. Pending Litigation

14 This category includes work to review and analyze claims asserted against the
15 Receivership Entities in two state court actions filed prior to the Receiver's
16 appointment. Allen Matkins assisted in gathering and reviewing documents and
17 information from the Wellman & Warren law firm, which had been representing the
18 Receivership Entities in the actions. The firm also communicated with counsel for
19 the plaintiffs and ensured that notices of the receivership and the stay of litigation
20 against the Receivership Entities was properly filed in the actions. The reasonable
21 and necessary fees for work in this category total \$7,055.55.

22 7. Third Party Claims

23 This category focuses primarily on work to review, analyze, and respond to
24 the claims asserted by Zhao, including her motion to intervene, direct the Receiver
25 to return more than \$3 million in funds to Ally accounts at Bank of America, and
26 unfreeze such funds so they could be withdrawn by Zhao ("Zhao Motion"). Dkt.
27 No. 26. Due to the large amount at stake and the likelihood that the funds would
28 leave the country if they were unfrozen, the Receiver and Allen Matkins spent

1 substantial time analyzing the claims asserted by Zhao, analyzing claims and
2 provisional remedies the Receiver could pursue against Zhao, attempting to resolve
3 the dispute through various discussions with counsel for Zhao, and developing
4 evidence to establish the status of Ally as an affiliated entity. The Receiver's
5 opposition to the Zhao Motion, along with three supporting declarations, was filed
6 on November 30, 2015. Dkt. No. 29.

7 Allen Matkins also assisted in efforts to obtain Zhao and Ally's compliance
8 with document subpoenas issued to them on November 3, 2015. Zhao and Ally
9 objected to the subpoenas and refused to produce the requested documents. Allen
10 Matkins participated in meet and confers with counsel for Zhao and Ally, and the
11 Receiver agreed to limit his requests by scope and timeframe. Zhao and Ally still
12 refused to produce the requested documents. The Receiver, therefore, was forced to
13 move to compel production. Allen Matkins prepared the joint stipulation regarding
14 the motion to compel, which, pursuant to the local rules, was submitted to Zhao's
15 counsel for comment in early January. After receiving Zhao's comments, the joint
16 stipulation/motion to compel was filed on January 20, 2016. Dkt. No. 39. The
17 motion was granted on February 4, 2016. Dkt. No. 44.

18 The reasonable and necessary fees for Allen Matkins' work in this category
19 total \$45,215.10.

20 **B. Summary of Expenses Requested for Reimbursement**

21 Allen Matkins requests the Court approve reimbursement of \$9,755.22 in out-
22 of-pocket costs. The itemization of such expenses is summarized below by
23 category. The majority of the expenses incurred relate to the preparation, issuance
24 and service of subpoenas, notices, and demands to third parties as well as payments
25 made to responding parties for reasonable costs of production. As explained above,
26 Allen Matkins issued approximately 47 subpoenas, notices, and demand letters, and
27 gathered documents in response from approximately 23 of these subpoenas and
28 demands. Each of these subpoenas required proper service, which often proved

difficult and time consuming due to the lack of records maintained by the Receivership Entities. Despite the difficulties, each subpoena issued was properly served and responsive documents have been produced. In addition the expenses charged to this category include costs for various court filings, including filings made pursuant to 28 U.S.C. section 754 in various other districts where receivership assets may be located, and county recordings where the Receivership Entities own property. Finally, costs incurred for legal research are also included.

The total for costs incurred by Allen Matkins are broken down by category as follows:

Category	Total
Legal Research / PACER fees	1,631.20
Messenger fees (court messenger/FedEx)	775.83
Service of Process – Subpoenas	2,039.90
Duplication/Faxes/Postage	458.10
Court Filing Fees/Recorder Fees/Statutory Fees	4,083.63
Subpoena Document Production Costs	766.56
TOTAL	\$9,755.22

III. THE FEES AND COSTS ARE REASONABLE AND SHOULD BE ALLOWED

"As a general rule, the expenses and fees of a receivership are a charge upon the property administered." *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994). These expenses include the fees and expenses of this Receiver and his professionals, including Allen Matkins. Decisions regarding the timing and amount of an award of fees and costs to the Receiver and his Professionals are committed to the sound discretion of the Court. *See SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992) (rev'd in part on other grounds, 998 F.2d 922 (11th Cir. 1993)).

In allowing fees, a court should consider "the time, labor and skill required, but not necessarily that actually expended, in the proper performance of the duties imposed by the court upon the receiver[], the fair value of such time, labor and skill

1 measured by conservative business standards, the degree of activity, integrity and
 2 dispatch with which the work is conducted and the result obtained." *United States v.*
 3 *Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks
 4 omitted). In practical terms, receiver and professional compensation thus ultimately
 5 rests upon the result of an equitable, multi-factor balancing test involving the
 6 "economy of administration, the burden that the estate may be able to bear, the
 7 amount of time required, although not necessarily expended, and the overall value of
 8 the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F. 2d 232, 237 (3d Cir.
 9 1970). Regardless of how this balancing test is formulated, no single factor is
 10 determinative and "a reasonable fee is based [upon] all circumstances surrounding
 11 the receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*,
 12 374 F. Supp. 465, 480 (S.D. Tex. 1974).

13 As a preliminary matter, the TRO and PI Order confer on the Receiver
 14 substantial duties and powers, including to conduct such investigation and discovery
 15 as is necessary to locate and account for all receivership assets, take such action as is
 16 necessary and appropriate to assume control over and preserve receivership assets,
 17 and employ attorneys and others to investigate and, where appropriate, institute,
 18 pursue, and prosecute all claims and causes of action of whatever kind and nature.
 19 *See* TRO, Part XI; PI Order, Part XI.

20 The Receiver promptly determined that experienced, qualified counsel was
 21 necessary due to the size and complexity of the receivership estate and engaged
 22 Allen Matkins pursuant to the authority granted to him in the TRO and PI Order.
 23 Allen Matkins immediately began work and has worked diligently and efficiently to
 24 assist the Receiver in carrying out his Court-ordered duties. The firm has submitted
 25 a detailed fee application which describes the nature of the services rendered, and
 26 the identity and billing rate of each individual performing each task. *See* Exhibit A.

27 Allen Matkins has endeavored to staff matters as efficiently as possible while
 28 remaining cognizant of the complexity of issues presented. The request for fees is

1 based on Allen Matkins' customary billing rates charged for comparable services
 2 provided in other matters, less a 10% discount. In addition, Allen Matkins did not
 3 charge for 3.8 hours of work during the First Application Period.

4 The work performed by Allen Matkins was essential to carrying out the
 5 Receiver's Court-ordered duties. Allen Matkins has worked diligently to preserve
 6 and protect the assets of the receivership estate, investigate and recover sums
 7 transferred to third parties, and maximize the funds available for ultimate
 8 distribution to investors. Moreover, Allen Matkins seeks payment of only 80% of
 9 fees incurred on an interim basis in recognition of the fact that its work in assisting
 10 the Receiver is ongoing. Payment of the proposed 20% holdback will be sought at
 11 the conclusion of the receivership. Allen Matkins' fees are fair and reasonable and
 12 should be approved and paid on an interim basis.

13 IV. CONCLUSION

14 Allen Matkins, therefore, respectfully requests the Court enter an Order:

- 15 1. Approving Allen Matkins' fees, on an interim basis, of \$194,607.90;
- 16 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
 17 \$155,686.32, from the assets of the Receivership Entities;
- 18 3. Approving Allen Matkins' costs in the amount of \$9,755.22, and
 19 authorizing and directing the Receiver to reimburse such costs in full; and
- 20 4. For such other and further relief as the Court deems appropriate.

21
 22 Dated: April 4, 2016

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

By: /s/ Edward Fates

EDWARD G. FATES
 Attorneys for Receiver
 Thomas A. Seaman

EXHIBIT A

03/16/16 11:33:01 PROFORMA STATEMENT FOR MATTER 375323-00002 (General Receivership) 375323-00002

Preliminary Billing Form

Billing Atty: 000313 - Zaro

Matter #: 375323-00002

Matter Name: General Receivership

Date of Last Billing:

Client Name: Seaman, Thomas A./Receiver for US Fine Investment Arts Inc

Proforma Number

Client/Matter Joint Group # 375323-1

Fees for Matter 375323-00002 (General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
09/29/15	6785724	Review and consider need for recording TRO in various counties, assess 28 USC 754 and arrange to obtain certified copies of TRO (0.3).	Hsu, Tim	0.3	113.40	113.40
09/30/15	6662185	Research/analysis of attorney-client privilege issues (.6). Revise letter to counsel for Mr. Chen re turnover/attorney-client privilege (.5). Work on document review at company site to address related entities/notice to law firms, accountants and identify assets (3.7).	Zaro, David R.	4.8	3,218.40	3,331.80
09/30/15	6659101	Draft letter to counsel for S. Chen re receiver appointment, TRO, and communications with company employees and discuss same with Receiver (1.1); review SEC's complaint (.4); address takeover issues and priority tasks (.6); call and emails with S. Chen's counsel re attorney-client privilege and joint representation issues (.6).	Fates, Edward G.	2.7	1,312.20	4,644.00
10/01/15	6663262	Review and provide comments re proposed preliminary injunction order and consent to same on behalf of receivership entities and	Fates, Edward G.	1.3	631.80	5,275.80

03/16/16 11:33:01 PROFORMA STATEMENT FOR MATTER 375323-00002 (General Receivership) 375323-00002

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		communications with Receiver and SEC's counsel re same (1.1); advise re AUSA request and former employees (.2).				
10/02/15	6799841	Work with Receiver as to issues re to AUSA, address discovery/investigation (.6). Call/emails with the Commission as to orders (.4). Address the AUSA discovery requests (.6). Review of cease & desist order from California Department of Business Oversight and accompanying discovery (.4). Email to counsel/Receiver re appropriate response to Cease & Desis Order (.4).	Zaro, David R.	2.4	1,609.20	6,885.00
10/02/15	6663567	Review letter, cease and desist order, and discovery requests from California Department of Business Oversight and call to A. Wright re same (.4); discuss S. Chen proposed changes to preliminary injunction order with SEC's counsel (.2); address AUSA's request for gemstone appraiser information and access to offices and coordinate and discuss same with Receiver and A. Juroe (.8).	Fates, Edward G.	1.4	680.40	7,565.40
10/05/15	6799844	Call with Receiver re AUSA discovery, follow-up to review subpoena (.4). Address gmail/google accounts and address turnover, work on the issues related to the same (.3). Review/evaluate ceases & desist order, discovery and follow-up with counsel re same (.3).	Zaro, David R.	1.0	670.50	8,235.90

03/16/16 11:33:01 PROFORMA STATEMENT FOR MATTER 375323-00002 (General Receivership) 375323-00002

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
10/05/15	6664977	Telephone conference and email with California Department of Business Oversight re Desist and Refrain Order and discovery requests.	Fates, Edward G.	0.5	243.00	8,478.90
10/08/15	6786029	Call with SEC related to Preliminary Injunction Order, follow-up with Receiver re 28 USC 754 and email re same (.4).	Zaro, David R.	0.4	268.20	8,747.10
10/08/15	6785779	Attention to issues re certified copies of TRO for 754 filings and recordings and calls to filing office clerk re the same (0.9).	Hsu, Tim	0.9	340.20	9,087.30
10/08/15	6677647	Strategic planning and assess approach re miscellaneous case filings and county recordings.	Griffin, Peter	0.6	167.40	9,254.70
10/09/15	6670296	Review Preliminary Injunction Order entered by Court.	Fates, Edward G.	0.2	97.20	9,351.90
10/09/15	6786032	Review preliminary injunction and coordinate recordation of TRO and filing of miscellaneous case filings in the various California and Nevada district courts (0.9).	Hsu, Tim	0.9	340.20	9,692.10
10/09/15	6677657	Analyze 28 USC Section 754 (.8); work on drafts and filings re Notice of Appointment of Receiver and Application for Miscellaneous Case Number in California and Nevada United States District Courts (1.8).	Griffin, Peter	2.6	725.40	10,417.50
10/13/15	6785786	Coordinate filing of 754 notices of receivership (0.4).	Hsu, Tim	0.4	151.20	10,568.70
10/13/15	6677669	Analyze California Government Code re recordings (.5); File recording documents in California counties	Griffin, Peter	2.2	613.80	11,182.50

03/16/16 11:33:01 PROFORMA STATEMENT FOR MATTER 375323-00002 (General Receivership) 375323-00002

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		where receivership properties located (1.7).				
10/14/15	6799849	Review the grand jury subpoenas from AUSA, preliminary evaluation of receiver's response (.4). Call with Receiver with re grand jury subpoenas (.2).	Zaro, David R.	0.6	402.30	11,584.80
10/14/15	6672847	Review grand jury subpoenas issued to Receiver (.2); respond to inquiry from California Dept. of Business Oversight (.2).	Fates, Edward G.	0.4	194.40	11,779.20
10/14/15	6673783	Prepare draft motion for order in aid of receivership and draft declaration of the receiver in support (5.4); Correspondence with Receiver re translation service providers for update to Website (0.3); Review status of various 754 filings (0.2).	Hsu, Tim	5.9	2,230.20	14,009.40
10/15/15	6674669	Work on motion for order in aid of receivership.	Fates, Edward G.	0.4	194.40	14,203.80
10/15/15	6678694	Continue draft of motion for order in aid and draft receiver's declaration in support (2.3); Correspondence to Receiver to request additional information for motion for order in aid (0.2).	Hsu, Tim	2.5	945.00	15,148.80
10/16/15	6799875	Conference with SEC/Receiver re grand jury subpoenas (.2).	Zaro, David R.	0.2	134.10	15,282.90
10/16/15	6677684	Review California Government Code and recording documents (.7); Phone call with San Bernardino Recorder's Office (.3); Review 28 U.S.C 754 (.3); Phone call with U.S. District Court - District of Nevada re application for	Griffin, Peter	1.7	474.30	15,757.20

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		miscellaneous case number (.4).				
10/20/15	6799892	Call to address the AUSA grand jury subpoenas and bank records (.4). Call with Receiver re discovery, grand jury subpoenas and accounting issues (.5).	Zaro, David R.	0.9	603.45	16,360.65
10/20/15	6680696	Two phone calls with San Bernardino Recorder's Office re recording receivership properties (.3); Analyze state and local rules re recordings (.3); File San Bernardino recording documentation (.5).	Griffin, Peter	1.1	306.90	16,667.55
10/23/15	6682853	Call with counsel to address the AUSA response/subpoena and documents (.3).	Zaro, David R.	0.3	201.15	16,868.70
10/28/15	6785806	Attention to issues re recording of PI in various counties (0.3).	Hsu, Tim	0.3	113.40	16,982.10
10/29/15	6685679	Work on document production/privilege review pursuant to US Attorney subpoena.	Fates, Edward G.	1.3	631.80	17,613.90
10/30/15	6799862	Call with Receiver re AUSA concerning document production (.2).	Zaro, David R.	0.2	134.10	17,748.00
11/02/15	6799836	Review Amkey Global issues/documents requested per the AUSA grand jury subpoena and email from Mr. Mo Chen's counsel (.2).	Zaro, David R.	0.2	134.10	17,882.10
11/02/15	6799871	Review lengthy email from SEC's counsel re potential ongoing money raising activities (.2).	Fates, Edward G.	0.2	97.20	17,979.30
11/04/15	6695518	Finalize Crowley documents for production to SEC.	Kaup, John T.	0.5	114.75	18,094.05
11/04/15	6693420	Work on document production	Fates, Edward G.	0.4	194.40	18,288.45

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		pursuant to subpoena and prepare letter to AUSA R. Robinson re same.				
11/06/15	6696868	Communications with AUSA R. Robinson re document production.	Fates, Edward G.	0.2	97.20	18,385.65
11/10/15	6700799	Review emails, call Receiver re advice as to AUSA, discovery, grand jury subpoena and coordination of production (.4). Follow-up advice to counsel re attorney documents/turnover (.2).	Zaro, David R.	0.6	402.30	18,787.95
11/11/15	6702891	Perform privilege review and prepare attorney firm documents for production to SEC.	Kaup, John T.	2.5	573.75	19,361.70
11/11/15	6700771	Attention to privilege review issues for documents requested by AUSA from former counsel for receivership entities.	Fates, Edward G.	0.4	194.40	19,556.10
11/16/15	6799865	Review issues and email related to the AUSA discovery requests related to the grand jury subpoena (.5).	Zaro, David R.	0.5	335.25	19,891.35
11/23/15	6709937	Work on motion for order in aid of receivership (.4).	Fates, Edward G.	0.4	194.40	20,085.75

Disbursements for Matter 375323-00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt
09/29/15	2172405	Other Court Charges - - Nationwide ALLEN, MATKINS, LECK, GAMBLE ET AL ^ 138076	1.00	83.60
10/01/15	2171005	Duplication	421.00	63.15
10/02/15	2171004	Duplication	500.00	75.00
10/05/15	2171006	Duplication	316.00	47.40

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10/05/15	2171823	Messenger - - Federal Express Invoice No: 518625567 313 Ship To: Thomas Seaman	1.00	15.61
10/05/15	2176728	Other Court Charges - - Nationwide USDC/CENTRAL DISTRICT ^ 138413	1.00	278.00
10/06/15	2171824	Messenger - - Federal Express Invoice No: 518625567 313 Ship To: Steven P Scandura, Esq	1.00	15.11
10/06/15	2176449	Messenger - - Federal Express Invoice No: 653630399 055 Ship To: OCBC BANK	1.00	37.02
10/06/15	2176450	Messenger - - Federal Express Invoice No: 653630399 055 Ship To: ADRIAN CHAN, LYDIA PAN	1.00	37.02
10/06/15	2176451	Messenger - - Federal Express Invoice No: 653630399 055 Ship To: LEGAL DEPARTMENT	1.00	37.02
10/06/15	2184050	Service of Process - - Nationwide WENTING LIU ^ 138751	1.00	309.55
10/07/15	2173291	Duplication	24.00	3.60
10/07/15	2176208	Messenger - - Federal Express Invoice No: 519383732 055 Ship To: Ms Wenting Liu	1.00	14.15
10/08/15	2173292	Duplication	438.00	65.70
10/08/15	2176209	Messenger - - Federal Express Invoice No: 519383732 209 Ship To: Alison Juroe	1.00	9.95
10/08/15	2176729	Messenger - - Nationwide USDC/CENTRAL DISTRICT ^ 138413	1.00	23.00
10/09/15	2173287	Duplication	210.00	31.50
10/09/15	2173293	Duplication	54.00	8.10
10/09/15	2176452	Messenger - - Federal Express Invoice No: 653884971 055 Ship To: MO A K A YAN CHEN	1.00	37.02
10/09/15	2176720	Filing Fees - - Nationwide CR/SAN BERNARDINO COUNTY RECORDER ^ 138413	1.00	219.50

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10/09/15	2176721	Filing Fees - - Nationwide CR/RIVERSIDE COUNTY RECORDER ^ 138413	1.00	205.45
10/09/15	2176722	Filing Fees - - Nationwide CR/ORANGE COUNTY RECORDER ^ 138413	1.00	120.40
10/09/15	2176723	Filing Fees - - Nationwide CR/LOS ANGELES COUNTY RECORDERS ^ 138413	1.00	84.75
10/13/15	2173288	Duplication	53.00	7.95
10/13/15	2173294	Duplication	172.00	25.80
10/13/15	2176724	Filing Fees - - Nationwide CR/SAN BERNARDINO COUNTY RECORDER ^ 138413	1.00	261.35
10/13/15	2176725	Filing Fees - - Nationwide CR/RIVERSIDE COUNTY RECORDER ^ 138413	1.00	330.35
10/13/15	2176726	Filing Fees - - Nationwide CR/ORANGE COUNTY RECORDER ^ 138413	1.00	230.30
10/13/15	2176727	Filing Fees - - Nationwide CR/LOS ANGELES COUNTY RECORDERS ^ 138413	1.00	219.50
10/13/15	2176730	Other Court Charges - - Nationwide USDC/CENTRAL DISTRICT ^ 138413	1.00	206.00
10/13/15	2176731	Filing Fees - - Nationwide USDC/SAN FRANCISCO NORTHERN DIST. ^ 138413	1.00	119.00
10/14/15	2171976	Filing Fees - - U.S. District Court, District of Nevada - Obtain Miscellaneous Case No.	1.00	46.00
10/14/15	2173289	Duplication	56.00	8.40
10/14/15	2173290	Duplication	361.00	54.15
10/14/15	2173295	Duplication	118.00	17.70
10/14/15	2176362	Messenger - - Federal Express Invoice No: 520126106 13 Ship To: Thomas Seaman	1.00	17.23

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10/14/15	2176363	Messenger - - Federal Express Invoice No: 520126106 209 Ship To: Clerk of the Court	1.00	13.41
10/19/15	2176364	Messenger - - Federal Express Invoice No: 520126106 13 Ship To: Steven P Scadura	1.00	15.11
10/20/15	2173296	Duplication	145.00	21.75
10/20/15	2184053	Filing Fees - - Nationwide CR/SAN BERNARDINO COUNTY RECORDER ^ 138751	1.00	112.50
10/20/15	2184054	Messenger - - Nationwide CR/LOS ANGELES COUNTY RECORDERS ^ 138751	1.00	107.00
10/20/15	2184055	Messenger - - Nationwide CR/ORANGE COUNTY RECORDER ^ 138751	1.00	111.00
10/20/15	2184056	Filing Fees - - Nationwide CR/RIVERSIDE COUNTY RECORDER ^ 138751	1.00	105.50
10/20/15	2184057	Other Court Charges - - Nationwide USDC/CENTRAL DISTRICT ^ 138751	1.00	107.60
10/21/15	2175552	Duplication	54.00	8.10
10/21/15	2182047	Messenger - - Federal Express Invoice No: 520857080 209 Ship To: Tim McDonnell	1.00	9.95
10/21/15	2184058	Filing Fees - - Nationwide GLENDALE SUPERIOR COURTHOUSE ^ 138751	1.00	103.25
10/27/15	2184051	Messenger - - Nationwide WELLMAN & WARREN ^ 138751	1.00	62.25
10/30/15	2184052	Service of Process - - Nationwide BANK OF AMERICA ^ 138751	1.00	115.00
11/02/15	2182890	Lexis Lexis - Research	1.00	156.00
11/03/15	2178731	Duplication	38.00	5.70
11/03/15	2182236	Messenger - - Federal Express Invoice No: 521592383 055 Ship To: Thomas Zaccaro, Esq	1.00	10.25

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11/03/15	2184150	Service of Process - - Nationwide NEWSPARKLE STONE BEADS IMPORT LLC ^ 139073	1.00	175.65
11/03/15	2184151	Service of Process - - Nationwide NEWSPARKLE STONE BEADS IMPORT ^ 139073	1.00	270.00
11/03/15	2184155	Other Court Charges - - Nationwide USDC/CENTRAL DISTRICT ^ 139073	1.00	258.00
11/04/15	2182400	Messenger - - Federal Express Invoice No: 522342519 209 Ship To: Tim McDonnell, Project Manager	1.00	10.54
11/06/15	2178732	Duplication	6.00	0.90
11/06/15	2184152	Service of Process - - Nationwide BANK OF AMERICA ^ 139073	1.00	95.00
11/10/15	2184153	Service of Process - - Nationwide JP MORGAN CHASE BANK ^ 139073	1.00	115.00
11/10/15	2184154	Service of Process - - Nationwide BANK OF AMERICA ^ 139073	1.00	35.00
11/11/15	2182891	Lexis Lexis - Research	1.00	31.60
11/12/15	2182500	Messenger - - Federal Express Invoice No: 523081407 665 Ship To: Richard Robinson	1.00	10.76
11/12/15	2182892	Lexis Lexis - Research	1.00	194.80
11/13/15	2182501	Messenger - - Federal Express Invoice No: 523081407 665 Ship To: R Gary Klausner	1.00	10.76
11/16/15	2179986	Duplication	4.00	0.60
11/17/15	2182893	Lexis Lexis - Research	1.00	509.60
11/18/15	2182894	Lexis Lexis - Research	1.00	402.40
11/18/15	2191051	Other Court Charges - - Nationwide - ROYBAL FEDERAL BUILDING USDC/USBC ^ 425678	1.00	27.00
11/20/15	2182657	Messenger - - Federal Express Invoice No: 523867337 13 Ship To: Steve R Welk	1.00	10.25

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Trans Date	Index	Type	Quantity	Amt
11/20/15	2183852	Duplication	17.00	2.55
11/23/15	2181954	Production of Documents - - Bank of America - Bank Documents, Court Case Name: Li Zhao	1.00	40.58
11/23/15	2190732	Service of Process - - Nationwide - PORSCHE OF DOWNTOWN L.A. ^ 139361	1.00	185.85
11/23/15	2190733	Service of Process - - Nationwide - PORSCHE OF DOWNTOWN L.A. ^ 139361	1.00	79.00
11/24/15	2184837	Production of Documents - - Bank of America - Bank Documents, Court Case Name: Li Zhao	1.00	525.00
12/01/15	2191071	Other Court Charges - - Nationwide - ROYBAL FEDERAL BUILDING USDC/USBC ^ 425888	1.00	27.00
12/03/15	2186782	Statutory Fees - - CT Corporation USFIA Singapore Pte Ltd. (SING)^14527388RI	1.00	909.88
12/09/15	2187962	Messenger - - Federal Express Invoice No: 526052371 2055	1.00	10.76
12/10/15	2187963	Messenger - - Federal Express Invoice No: 526052371 2055	1.00	10.76
12/17/15	2190204	Lexis Lexis - Research	1.00	68.40
12/17/15	2191267	Production of Documents - - JPMorgan Chase Bank, N.A. - Bank Documents re Securities and Exchange Commission vs. Steve Chen; USFIA, Inc., et al.	1.00	65.04
12/17/15	2197603	Messenger - - Federal Express Invoice No: 526875479 313	1.00	15.25
12/18/15	2197599	Messenger - - Federal Express Invoice No: 526875479 055	1.00	15.76
12/18/15	2197600	Messenger - - Federal Express Invoice No: 526875479 055	1.00	15.76
12/18/15	2197601	Messenger - - Federal Express Invoice No: 526875479 055	1.00	15.76
12/18/15	2197602	Messenger - - Federal Express Invoice No: 526875479 055	1.00	15.76
12/18/15	2199930	Messenger - - Nationwide - NATIONWIDE LEGAL *PROCESS**** ^ 140374	1.00	23.00

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Trans Date	Index	Type	Quantity	Amt
12/18/15	2199931	Service of Process - - Nationwide - BANK OF AMERICA ^ 140374	1.00	115.00
12/18/15	2199932	Service of Process - - Nationwide - EAST WEST BANK ^ 140374	1.00	105.00
12/22/15	2197598	Messenger - - Federal Express Invoice No: 526875479 055	1.00	15.76
12/30/15	2191208	Duplication	67.00	10.05
12/30/15	2192089	Production of Documents - - East West Bank - Re: Bank Documents	1.00	135.94
12/30/15	2199153	Lexis Lexis - Research	1.00	268.40
12/30/15	2199933	Service of Process - - Nationwide - DMDC INVESTMENTS DBA REALTY ^ 140374	1.00	160.65
12/30/15	2199934	Service of Process - - Nationwide - TITLE365 COMPANY ^ 140374	1.00	173.25
12/30/15	2199935	Service of Process - - Nationwide - MATHIS BROTHERS FURNITURE ^ 140374	1.00	157.50

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David R. Zaro	12.1	670.50	8,113.05
000820	John T. Kaup	3.0	229.50	688.50
001665	Edward G. Fates	9.8	486.00	4,762.80
002055	Tim Hsu	11.2	378.00	4,233.60
002209	Peter Griffin	8.2	279.00	2,287.80
		<u>44.3</u>		<u>20,085.75</u>
Total Fees				20,085.75
Total Disbursements				9,755.22

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Preliminary Billing Form

Billing Atty: 000313 - Zaro

Matter #: 375323-00003

Matter Name: Asset Investigation & Recovery

Date of Last Billing:

Client Name: Seaman, Thomas A./Receiver for US Fine Investment Arts Inc

Proforma Number 1257788

Client/Matter Joint Group # 375323-1

Fees for Matter 375323-00003 (Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
09/29/15	6659640	Review/evaluate the case background and calls with the SEC and Receiver related to takeover/legal issues re same (.7). Attend the takeover of the receivership entities, advice to Receiver concerning the scope/interpretation of order, address numerous legal issues concerning the businesses and coordination with government agencies (5.2).	Zaro, David R.	5.9	3,955.95	3,955.95
09/29/15	6660512	Assist Receiver with takeover of the main facility of the receivership entities, including coordinating with federal agency agents for the takeover, communicating and interviewing employees, accounting for physical assets and monies obtained in takeover (5.8); Review complaint and TRO and prepare employee questionnaires and other materials (1.6); Prepare template demand and notice letter for third parties re TRO and turnover of assets/records (0.4).	Hsu, Tim	7.8	2,948.40	6,904.35
09/30/15	6662150	Research/analysis of the scope of order/relationship of affiliates, bank	Zaro, David R.	0.7	469.35	7,373.70

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		accounts and notices to banks (.7).				
09/30/15	6660779	Review and provide input to letter to Bird Marella re TRO and receivership (0.4); Follow up on requests for certified copies of TRO for recordation (0.2); Review notes and information obtained from facilities takeover and evaluate need to record and/or file TRO in various counties and districts to secure receivership assets (0.8); Attention to issues re translation needs for notices and website for investors/creditors and confer with counsel re the same (0.3); Call with AUSA to discuss handling of investor inquiries, requests for information and other administrative matters and confer with counsel re the same (0.6); Review online marketing materials for receivership entities and purported business model (0.8); Review information for former counsel and other professionals representing receivership entities (0.5).	Hsu, Tim	3.4	1,285.20	8,658.90
10/01/15	6667008	Call with Receiver related to recovery of guns/notices (.4). Work on draft demand letters/notices and legal advice re scope/demands for turnover (.4). Review draft stipulated order/consent from Commission and emails re same (.5). Work on/advice to Receiver and counsel re same (.6). Review files/documents related to attorneys/retainers and accountants, advice to counsel/Receiver (.8). Emails/work with government	Zaro, David R.	3.4	2,279.70	10,938.60

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		agencies re document preservation/discovery requests (.4). Calls with Commission related to orders (.3).				
10/01/15	6663260	Meet with Receiver and A. Juroe at USFIA offices, review and gather documents on assets on site/locations and company assets potentially held by S. Chen, and address security and insurance issues (1.8); revise notice re turnover letters to attorneys and accountants for receivership entities (.5); call with SEC's counsel and Receiver re freezing of receivership entity foreign bank accounts (.3); review order sealing case file and attention to issues re obtaining certified copy of TRO (.2).	Fates, Edward G.	2.8	1,360.80	12,299.40
10/01/15	6664249	Draft and prepare various demand and turnover letters to identified former counsel and other professionals of the receivership entities (3.4); Calls with DOJ re subpoenas, service, and other requests (0.4); Review USFIA financial transactions and other records for turnover demands (0.7); Correspondences with Receiver re AUSA inquiries and other matters (0.7).	Hsu, Tim	5.2	1,965.60	14,265.00
10/02/15	6663281	Work on SEC's access letter and revise same (.3); work on notice re turnover letters to attorneys and accountants for receivership entities (1.1); work on letter to S. Chen's	Fates, Edward G.	3.2	1,555.20	15,820.20

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		counsel re location and recovery of rifles and other assets and discuss same with A. Juroe (.9); work on notice and turnover letter to J. Wuo and discuss same with A. Juroe (.4); review information provided by investor re One World Currency, Ammine, and Gemcoin (.2); discuss issues re company email accounts with A. Juroe (.3).				
10/02/15	6664247	Calls and correspondences with AUSA re receivership (0.6); Attention to issues with demand letters to attorneys/accountants/and others (0.6); Gather and prepare documents for all demand letters and send the same to parties for turnover of records and funds (1.3); Prepare summary of parties for demands and provide update to Receiver's staff and request additional information (0.5); Prepare and send access request to SEC (0.4); Email various demand letters to counsel/accountants and other parties (0.5); Provide translation for Receiver's staff on organization documents for USFIA and related entities (0.6); Review investor emails received from SEC (0.4); Calls and correspondence with DOJ and Receiver and staff re request for site access (0.4).	Hsu, Tim	5.3	2,003.40	17,823.60
10/05/15	6664383	Work on Google email account access and preservation issues (.4); finalize letter to S. Chen's counsel re rifles and other company assets (.3); work on letter to former counsel for	Fates, Edward G.	1.3	631.80	18,455.40

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		receivership entities re files, retainer, and related issues (.6).				
10/05/15	6669052	Review relevant records and confer with Receiver's staff re entities and individuals which require notice of the TRO (0.8); Prepare and send notice and demand letters to J.Wuo, First Ave. Edu., and L.Zhou (1.2); Review response from Wellman and Warren and prepare and send response letter to address issues raised re retainer fees (1.1); Prepare and send request and demand to Google re access to emails (0.6); Correspondences with Receiver re translation for website (0.3); Correspondences with DOJ re site visit (0.2).	Hsu, Tim	4.2	1,587.60	20,043.00
10/06/15	6690388	Prepare and send subpoena to Wenting Liu and various demand letters to HSBC, OCBC and foreign entities (1.2); Attention to issues getting certified copies of TRO (0.3); Review additional information on Soloman Yang provided by Receiver and research information for related companies (0.6); Correspondences to Receiver re Soloman Yang and Am.Immigration Consultants (0.2);	Hsu, Tim	2.3	869.40	20,912.40
10/07/15	6668652	Call with Receiver related to the additional accounts/Amkey entities (.4).	Zaro, David R.	0.4	268.20	21,180.60
10/07/15	6690575	Review issues with class action lawsuit and prepare and send letter to counsel for plaintiff's re appointment of receiver (0.5); Prepare and send letter to John Wuo in capacity as	Hsu, Tim	1.9	718.20	21,898.80

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		agent for Golden Apple (0.3); Review records for other entities and individuals who may require notice of receivership and court's related orders (0.6); Review demands served/sent and responses outstanding (0.5).				
10/08/15	6670817	Work on Amkey and Amkey Global issues with Receiver/affiliate issues (.3). Review demand letter to Amkey Global/revise same and follow-up email (.3).	Zaro, David R.	0.6	402.30	22,301.10
10/08/15	6799845	Evaluate issues re possible EB5 scheme, address with immigration counsel (.3). Address the subpoenas to third parties related to banks, attorneys, and potential targets based on transfers, advice to Receiver re same (.4).	Zaro, David R.	0.7	469.35	22,770.45
10/08/15	6688401	Review records and information on USFIA provided by Receiver and prepare and send demand letters for records to Golden APple, Amkey Global, and Steamfont entities (1.5); Follow up on earlier subpoena to Wenting Liu (0.3); Attention to issues re accounts held by Amkey Global and request for turnover of those funds to receivership (0.7); Further correspondences with Receiver's staff re Amkey Global, Am. Immigration Consultant and other outstanding matters (0.4); Review response and records produced by Atrizadeh and Crowley and correspondence to Receiver re the same (1.3); Review	Hsu, Tim	6.9	2,608.20	25,378.65

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		and revise letter to BofA re Amkey Global accounts (0.5); Review class action complaint filed by L.Liu (0.4); Call with L.Liu to discuss stay/dismissal of class action against entity defendants pursuant to appointment order (0.7); Provide update to Receiver and staff re responses from OCBC and HSBC bank and recommendations re the same (0.4); Review authorities on extension of jurisdiction internationally (0.7).				
10/09/15	6670909	Call/email related to Amkey, follow-up with Receiver re assets/scope of order (.4). Call with SEC re to Amkey Global and the Preliminary Injunction Order (.2). Follow-up on Amkey Global issues with counsel/Receiver to address Receiver control of assets (.6).	Zaro, David R.	1.2	804.60	26,183.25
10/09/15	6670275	Call with counsel for Google re request for access and turnover of email accounts (0.6); Correspondences with Wellman and Warren re turnover of records and funds (0.4); Review receivership records and Prepare and send demand letters to OCBC, Am. Immigration Consultant, and Goldentree (1.3); Correspondences with Receiver and staff re insurance policies and other administrative matters (0.3); Correspondences with Homier Law re request for turnover of records (0.4); Review letters and subpoenas sent and update notes to	Hsu, Tim	4.2	1,587.60	27,770.85

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		track progress (0.5); Call with former employee to request information on entities and correspondence to Receiver's staff re the same (0.7).				
10/12/15	6672139	Review issues re related entities, investigation of assets/subpoenas to be sent and advice re Wellman Warren (.3). Evaluate the production from counsel and assess the work/documents produced (.7). Research/analysis of the Amkey/Amkey Global issues, conference with the Receiver related to evidence (.5). Call with Amkey Global counsel (.3).	Zaro, David R.	1.8	1,206.90	28,977.75
10/12/15	6688390	Review issues re American immigration consultants and confer with counsel re the same (0.4); Conference calls to discuss various outstanding and priority items for USFIA (1.8); Attention to issues with Google gmail account access (0.5); Correspondence to Receiver to provide list of priority issues for scheduled call (0.2); Review files produced by Homier Law and provide update to Receiver re the same (0.8).	Hsu, Tim	3.7	1,398.60	30,376.35
10/13/15	6674489	Call with Receiver related to the Amkey Global/Amkey issues, prepare for meeting with Mr. Chen (.4). Follow-up on Amkey documents and email to counsel re Amkey enterprise (.4). Several calls and emails with Receiver and counsel for Mo Chen (.8).	Zaro, David R.	1.6	1,072.80	31,449.15

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10/13/15	6799848	Review article/information relating to American Immigration Consultant entity (.2); review documents produced by Homier law firm (.3).	Fates, Edward G.	0.5	243.00	31,692.15
10/13/15	6688386	Conference call with Receiver and counsel to discuss various receivership issues (1.2); Review records produced by Homier law (0.6); Provide update to Receiver and staff re Homier production (0.2); Correspondence with Receiver's staff re bad addresses for G.Berk (0.2); Review other USFIA records received and draft various demand letters for turnover of records (0.7).	Hsu, Tim	2.9	1,096.20	32,788.35
10/14/15	6675023	Emails with counsel for Mr. Chen re Amkey Global and Receiver meeting, follow-up with Receiver re same (.3). Call with Receiver as to Amkey Global/operations and next step (.1).	Zaro, David R.	0.4	268.20	33,056.55
10/14/15	6799852	Communications with Receiver and SEC counsel re meeting with M. Chen on Amkey Global (.6); call/emails with counsel for S. Chen re fee retainer, legal files, turnover of rifle and related issues (.7); discuss same with Receiver.	Fates, Edward G.	1.3	631.80	33,688.35
10/15/15	6677139	Review documents related to Amkey Global and follow-up to address operations/approach to sale (.8). Call/email re Amkey Global bank accounts/turnover of accounts (.4).	Zaro, David R.	1.2	804.60	34,492.95
10/15/15	6674330	Telephone call and emails with Receiver and S. Chen's counsel re turnover of rifle at USFIA building (.3);	Fates, Edward G.	0.5	243.00	34,735.95

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		discuss tenant lease termination issue with Receiver (.2).				
10/15/15	6674884	Work on document subpoenas and demand letters and follow up communications re same.	Fates, Edward G.	0.5	243.00	34,978.95
10/15/15	6688365	Review records from JPW and correspondence to Receiver re the same (0.5); Prepare and send demand letter to G.Berk (0.4); Call with G.Berk re USFIA services provided (0.5); Call to discuss demand for records with J.Schrenger law firm (0.4); Review and provide translation for Receiver's staff re USFIA internal memo on Vietnam activities (0.8); Review outstanding responses to demand letters and update status for each (0.5).	Hsu, Tim	2.9	1,096.20	36,075.15
10/16/15	6677212	Several emails with Receiver and SEC re discovery, bank accounts, affiliates (.3).	Zaro, David R.	0.3	201.15	36,276.30
10/19/15	6678123	Call with AUSA related to subpoena (.2) Letter/emails related to assets possibly held by related entities/Ally and Zhao (.4). Call with Receiver related to the Zhao/Ally entity and accounts, follow-up document review (.6). Emails with Receiver related to accounts/actions (.3).	Zaro, David R.	1.5	1,005.75	37,282.05
10/20/15	6679719	Call related to Amkey Global issues/operations and means to operate legally (.4). Call re accounts and related enterprises including Ally and email re same (.2).	Zaro, David R.	0.6	402.30	37,684.35

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10/20/15	6799891	Review documents related to the operation of USFIA, assess tracing of assets/sales people (.5). Work on subpoenas/discovery related to the banks in order to support accounting (.6).	Zaro, David R.	1.1	737.55	38,421.90
10/20/15	6677942	Communications with SEC's counsel re access letter and bank records for receivership entity accounts.	Fates, Edward G.	0.2	97.20	38,519.10
10/22/15	6680883	Call with R.Hsu, Esq. re subpoena to Wenting Liu and separate demand to Lexint Law (0.7); Review records produced by R.Hsu and correspondence with Receiver's staff re the same (0.5); Review and revise tracking log to provide updates on outstanding items (0.3); Correspondence to Receiver re inquiry from local reporter (0.1).	Hsu, Tim	1.6	604.80	39,123.90
10/23/15	6786044	Emails related to frozen accounts of Ally and Zhao, analysis of issues/scope of order and background (.6). Call with Receiver to address the frozen accounts, Ally and Zhao (.3).	Zaro, David R.	0.9	603.45	39,727.35
10/23/15	6681324	Follow up communications with S. Chen's counsel re turnover of records (.2); address status of document production by Wellman & Warren firm (.2); address issues re requests for records from foreign entities (.1).	Fates, Edward G.	0.5	243.00	39,970.35
10/23/15	6786049	Analyze issues raised by counsel for L. Zhao re frozen accounts and discuss facts re accounts with Receiver (.5).	Fates, Edward G.	0.5	243.00	40,213.35

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10/23/15	6688324	Review responses from HSBC and foreign law firm and update tracking log for the same (0.3); Call and correspondence to Wellman re demand for turnover of records (0.3); Review outstanding responses to demands for turnover of records (0.7).	Hsu, Tim	1.3	491.40	40,704.75
10/26/15	6683573	Call with Receiver and address issues re affiliate entities/legal issue re freeze (.3). Assess the freeze issues and the claim s to Bank of America accounts (.6).	Zaro, David R.	0.9	603.45	41,308.20
10/26/15	6682907	Review and revise translated language for website and confer with Receiver's staff re the same (0.6).	Hsu, Tim	0.6	226.80	41,535.00
10/26/15	6682908	Attention to issues re recording in SB county (0.3); Review issues re return of funds and request for records to W&W (0.4).	Hsu, Tim	0.7	264.60	41,799.60
10/27/15	6685381	Call with counsel for Ms. Zhao and Mo Chen/Amkey Global to address their respective claims related to frozen accounts/Amkey Global business (.4). Call with Receiver re the Ally and Mo Chen matters, asset recovery and Amkey Global operations (.3). Call with SEC, follow-up with Receiver/email re accounts/safe deposit box (.6).	Zaro, David R.	1.3	871.65	42,671.25
10/27/15	6688289	Call with Wellman and Warren to discuss request for turnover of records and funds (0.4).	Hsu, Tim	0.4	151.20	42,822.45
10/28/15	6686164	Call with claimant's counsel re bank accounts, Amkey and address	Zaro, David R.	1.8	1,206.90	44,029.35

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		recovery of the same (.4) Email to Receiver re real property assets (.3). Call/email with counsel/Receiver and SEC re accounts (.2). Review/evaluate issues re Ally and address bank accounts/frozen assets (.6). Call concerning the Amkey Global assets (.3).				
10/28/15	6688298	Review correspondence from Kuwada to request for turnover of files and funds and provide response and authorities pursuant to which Receiver is entitled to records and assets (0.7); Follow up correspondence to Lexint Law re demand for turnover of records (0.3).	Hsu, Tim	1.0	378.00	44,407.35
10/29/15	6687195	Review issues related to discovery/turnover and subpoena issues re law firm (.4). Address the issuance of subpoenas, follow-up with Receiver, advice as to scope (.7).	Zaro, David R.	1.1	737.55	45,144.90
10/29/15	6687224	Call with Receiver re BofA accounts, safe deposit box/turnover issues (.4). Analysis of potential fraud/conveyance claims, freeze, attachment and review documents re same (.5). Email to the Receiver and SEC re accounts of BofA (.3).	Zaro, David R.	1.2	804.60	45,949.50
10/29/15	6687294	Privilege review and related background research for production of Crowley firm documents.	Kaup, John T.	2.8	642.60	46,592.10
10/29/15	6685689	Work on issues relating to frozen Zhao/Ally accounts and discuss same with Receiver.	Fates, Edward G.	0.3	145.80	46,737.90

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10/29/15	6799857	Telephone conference and emails with counsel for S. Chen re production of documents pursuant to preliminary injunction order, joint representation issues, costs, privilege review, and related issues and work on follow up letter re same (1.3).	Fates, Edward G.	1.3	631.80	47,369.70
10/29/15	6688311	Attention to issues re demand for return of rifles (0.2).	Hsu, Tim	0.2	75.60	47,445.30
10/30/15	6690536	Address the legal issues concerning fraudulent conveyance claims/evidence, follow-up on emails from counsel and next steps (.8). Call with counsel and the Receiver re Ally investments, the account freeze/recovery of the funds transferred (.4). Review Ally investment/Ms.Zhao claims, BofA documents and subpoena (.3). Follow-up on the draft declaration re Ally (.3).	Zaro, David R.	1.8	1,206.90	48,652.20
10/30/15	6799860	Follow-up on email related to Bird Marella, advice to counsel (.3). Review subpoenas/Amkey and email to counsel re grand jury subpoena (.3).	Zaro, David R.	0.6	402.30	49,054.50
10/30/15	6687119	Communications with Bank of America and work on subpoena (.7); work on letter to S. Chen's counsel re turnover of files, retainer, and related issues (1.6); call from counsel for former employee re turnover of handgun and pick up personal items and discuss same with A. Juroe (.4).	Fates, Edward G.	2.7	1,312.20	50,366.70
10/30/15	6688318	Attention to issues re request for	Hsu, Tim	0.8	302.40	50,669.10

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		records from BofA and prepare and serve subpoena to BofA for the same (0.5); Review relevant records of USFIA accounts held at BofA and by various related parties and entities (0.3).				
11/01/15	6692380	Review declaration of Mr. Seaman re USFIA interests/assets transferred to Ally as well as Mr. Zhao (.4). Call with counsel/Receiver re next steps to recovery Ally/Zhao transfers (.3).	Zaro, David R.	0.7	469.35	51,138.45
11/02/15	6692382	Address Zhao documents (.4). Evaluate next steps re Amkey Global issues (.6).	Zaro, David R.	1.0	670.50	51,808.95
11/02/15	6692389	Assess issues related to investigation of the scheme/overseas activity and review of documents/email from the Commission (.4). Call to Receiver re investigation of new scheme/Dragon coin (.2).	Zaro, David R.	0.6	402.30	52,211.25
11/02/15	6691477	Work on letter to S. Chen's counsel re documents, engagement agreement, and retainer (.4); work on subpoena to Newspark entity (.2).	Fates, Edward G.	0.6	291.60	52,502.85
11/02/15	6787028	Telephone calls and emails with Receiver and Bank of America re production of Zhao/Ally account records (.5).	Fates, Edward G.	0.5	243.00	52,745.85
11/02/15	6714884	Review and prepare letter response to counsel for Kuwada (1.1); Call with BofA representative re subpoena for records (0.4); Review public records for Newsparkle Stone Beads Import, LLC and prepare subpoena for records to the entity (0.6);	Hsu, Tim	2.3	869.40	53,615.25

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		Correspondence with Receiver and staff re subpoena to BofA (0.2).				
11/02/15	6703933	Research effect of joint representation on attorney-client privilege (.8); research attorney's obligation to return client files upon termination of relationship (.7); edit turnover letter to Bird Marella reflecting aforementioned research (.4).	Griffin, Peter	1.9	530.10	54,145.35
11/03/15	6693624	Emails/call with SEC concerning the accounts/Ally and individual claims, follow-up call advice to counsel re legal rights, strategy, fraud and constructive trust (.8).	Zaro, David R.	0.8	536.40	54,681.75
11/03/15	6691467	Finalize and send letter to counsel for S. Chen re files, engagement agreement, and retainer (.3); revise letter to former counsel for receivership entities re production of files (.2).	Fates, Edward G.	0.5	243.00	54,924.75
11/03/15	6786060	Draft letter to Bank of America re freeze of Zhao/Ally accounts and discuss same with Receiver (1.6).	Fates, Edward G.	1.6	777.60	55,702.35
11/03/15	6787033	Calls and emails with Receiver and Bank of America re subpoena and production of L. Zhao/Ally account records (.2); communications with counsel for L. Zhao, Ally, and M. Chen re service of subpoenas and work on subpoenas (1.1).	Fates, Edward G.	1.3	631.80	56,334.15
11/03/15	6714874	Correspondences with Receiver's staff re preliminary injunction (0.3); Prepare subpoenas to Li Zhao, Ally Investors, and Mo Chen and send the	Hsu, Tim	1.8	680.40	57,014.55

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		same to counsel (0.7); Incorporate counsel comments to letter response to counsel for Kuwada re demand for turnover of funds (0.5); Finalize and serve subpoena to Newsparkle (0.3).				
11/04/15	6714841	Attention to issues re service of subpoena to Newsparkle (0.3).	Hsu, Tim	0.3	113.40	57,127.95
11/05/15	6694676	Analyze issues re Kuwada law firm refusing to turn over legal files and work on letter to Kuwada's counsel re same (.4).	Fates, Edward G.	0.4	194.40	57,322.35
11/05/15	6787036	Calls with Receiver and A. Juroe re Zhao/Ally account issues and production of records and communications with SEC's counsel re same (.7); communications with Zhao/Ally's counsel re production of records and conference call (.3).	Fates, Edward G.	1.0	486.00	57,808.35
11/06/15	6696157	Review letter from S. Chen's counsel re engagement agreement, documents, and retainer (.2); discuss issues relating to possible settlement with S. Chen with SEC's counsel (.2); discuss issues raised in letter from S. Chen's counsel with Receiver and respond to letter (.7); call with SEC's counsel relating to Bank of America account records (.2); analyze issues re delay in production of documents by Wellman firm (.1).	Fates, Edward G.	1.4	680.40	58,488.75
11/06/15	6714760	Review records re additional real properties found through Receiver's investigation and email to Receiver's staff re the same (0.6); Follow up with Wellman & Warren re promise to	Hsu, Tim	2.2	831.60	59,320.35

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		produce records and files (0.3); Review translated draft of website communications for investors and correspondence with Receiver's staff re the same (0.8); Prepare and serve additional subpoena to BofA for records re Ally Investors (0.5).				
11/09/15	6700760	Review emails/attachments as to Ally/Zhao claims and assess issues re recovery/strategy (.6). Calls re Ally with counsel and Receiver (.4). Review additional email re bank accounts/discovery and recovery via fraudulent conveyance (.5).	Zaro, David R.	1.5	1,005.75	60,326.10
11/09/15	6697633	Call with S. Chen's counsel re Mercedes automobile located at towing facility and production of engagement letter and retainer (.7); call with towing facility (.3); advise Receiver re same (.3).	Fates, Edward G.	1.3	631.80	60,957.90
11/09/15	6786064	Review information from A. Juroe relating to Zhao/Ally accounts and work on subpoenas for related accounts (.6); communications with Zhao/Ally's counsel and SEC's counsel re meet and confer (.2).	Fates, Edward G.	0.8	388.80	61,346.70
11/09/15	6703528	Review bank account information for Ally Investors, Li Zhao and Tongyi for preparation of subpoena to BofA and Chase (0.3); Prepare subpoenas to BofA and Chase for account information (0.6); Call with BofA representative re records for Ally Investors and email to representative to request the same (0.7); Call and correspondence with Wellman re	Hsu, Tim	2.1	793.80	62,140.50

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		missing production and to discuss issues re retainer held by Wellman (0.5).				
11/09/15	6713871	Research re receivership entities' potential ownership of real property in Orange and San Bernardino counties.	Griffin, Peter	0.4	111.60	62,252.10
11/10/15	6698818	Review engagement letter and retainer information from S. Chen's counsel, and advise Receiver re same (.4).	Fates, Edward G.	0.4	194.40	62,446.50
11/10/15	6703515	Call and correspondence with Wellman re production of files (0.3).	Hsu, Tim	0.3	113.40	62,559.90
11/11/15	6702280	Call with Receiver re Amkey Global operations and asset preservation, follow-up re same (.4). Address the issues re Bird Marella's claim to \$600k retainer (.2).	Zaro, David R.	0.6	402.30	62,962.20
11/11/15	6703505	Review records produced by Wellman (0.4); Draft MP&A iso application for writ of attachment (5.2); Prepare draft form application papers in support (1.1).	Hsu, Tim	6.7	2,532.60	65,494.80
11/12/15	6703497	Continue draft of MPA iso application for right to attach order and writ of attachment (1.9); Attention to issues re timing of filing for complaint and application (0.4); Retrieve and review corporate filing documents for Tonyi (HK) Trading Co. Ltd. (0.7); Correspondence to counsel and Receiver to provide summary update (0.4).	Hsu, Tim	3.4	1,285.20	66,780.00
11/13/15	6705576	Review issues related to Bird Marella retainer and advice re same (.3).	Zaro, David R.	0.3	201.15	66,981.15

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11/13/15	6703045	Draft letter to Bird Marella firm re return of retainer funds and discuss same with Receiver (.8).	Fates, Edward G.	0.8	388.80	67,369.95
11/13/15	6703489	Prepare draft letter to Bird Marella re demand for turnover (0.3); Review property records for additional properties owned by Golden Ark, and provide update and recommendation to Receiver (0.5); Correspondence to BofA to request follow up on missing records from subpoena production (0.2); Complete forms for application for right to attach order (0.7).	Hsu, Tim	1.7	642.60	68,012.55
11/16/15	6707610	Review correspondence documents related to and the Bird Marella retainer / evidence related to source / Singapore USFIA (.6).	Zaro, David R.	0.6	402.30	68,414.85
11/16/15	6785856	Call re Zhao / Ally matter / Zacarro letter response and advice to counsel re same (.3).	Zaro, David R.	0.3	201.15	68,616.00
11/16/15	6799867	Call with Receiver and Counsel related to the accounting and discovery (.2).	Zaro, David R.	0.2	134.10	68,750.10
11/16/15	6704842	Review correspondence from Bird Marella re retainer, discuss same with Receiver, and advise re investigation into Singapore entity.	Fates, Edward G.	0.4	194.40	68,944.50
11/16/15	6714720	Correspondence to BofA to follow up on request for supplemental production and request for expedited return on subpoenas (0.4); Call with representative for Newsparkle to discuss response to subpoena and request for extension (0.6); Review	Hsu, Tim	3.2	1,209.60	70,154.10

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		notices of appearance to be filed in action (0.4); Call and correspondence with Receiver's staff re property visit (0.3); Prepare draft letter response to counsel for Kuwada re demand for records (1.5).				
11/17/15	6707642	Review issues and information re Singapore /Vietnam USFIA entities and follow-up with Counsel and Receiver related to the same (.7).	Zaro, David R.	0.7	469.35	70,623.45
11/17/15	6704843	Review further correspondence from Bird Marella re retainer and discuss same with Receiver.	Fates, Edward G.	0.2	97.20	70,720.65
11/17/15	6705150	Discuss investigation into USFIA Singapore entity with SEC's counsel and work on same.	Fates, Edward G.	0.4	194.40	70,915.05
11/17/15	6705191	Revisions to letter to counsel for Kuwada re production of files (.3); communications with counsel for W. Liu re possible work for Receiver (.3).	Fates, Edward G.	0.6	291.60	71,206.65
11/17/15	6786080	Review letter from Zhao/Ally's counsel and discuss request for release of funds and response to same with SEC's counsel (.8).	Fates, Edward G.	0.8	388.80	71,595.45
11/17/15	6714698	Review correspondence received re request for records to Kuwada and provide update to Receiver re the same (0.3); Revise and send letter response to counsel for Kuwada re demand for records (0.4); Research issues re obtaining entity records for USFIA Singapore (1.6); Correspondences with BofA re request for supplemental production on subpoena (0.2); Call and	Hsu, Tim	2.9	1,096.20	72,691.65

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		correspondence with Receiver's staff re property visit (0.4).				
11/18/15	6707784	Call with Receiver concerning the strategy legal access to account information and follow-up (.3) review records related to the accounts/overseas accounts / follow- up (.4).	Zaro, David R.	0.7	469.35	73,161.00
11/18/15	6707790	Call with Receiver re amkey global matters/business issues/legal liability (.3); email with AUSA and call with Receiver re finds turnover (.3); review issues related to amkey global and assess the Receiver's legal obligation and rights as to business operation and follow-up thereon (.4).	Zaro, David R.	1.0	670.50	73,831.50
11/18/15	6706505	Analyze issues re Zhao/Ally accounts, freeze, and letter from counsel for Zhao/Ally requesting release of funds.	Fates, Edward G.	0.3	145.80	73,977.30
11/18/15	6714674	Correspondences for clarification with vendor for USFIA Singapore records (0.3).	Hsu, Tim	0.3	113.40	74,090.70
11/19/15	6708635	Call with Receiver related FBI/forfeiture and follow-up (.3); Draft letter to AUSA/FBI related to turnover of assets that were forfeited/seized prior to Receiver's appointment (.6).	Zaro, David R.	0.9	603.45	74,694.15
11/19/15	6707720	Review correspondence from counsel for Kuwada and advice re subpoena issue (.3); advise re investigation into USFIA Singapore entity (.2).	Fates, Edward G.	0.5	243.00	74,937.15
11/19/15	6708035	Respond to counsel for Zhao/Ally re status of bank subpoenas (.2); review objections to subpoenas from counsel	Fates, Edward G.	0.4	194.40	75,131.55

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		for Zhao/Ally (.2).				
11/19/15	6714649	Correspondences with BofA to request update on responses to subpoena (0.2); Attention to issues re retrieval of records for USFIA Singapore and correspondences with vendors re the same (1.3); Correspondences with counsel for G.Kuwada re request for records and prepare and serve subpoena for the same (1.1); Prepare for and visit receivership properties with Receiver's staff and interview residents/tenants (2.8).	Hsu, Tim	5.4	2,041.20	77,172.75
11/20/15	6710197	Review issues related to forfeiture, revise the letter concerning turnover of the seized funds (.6). Call with Receiver related to forfeiture issues (.2).	Zaro, David R.	0.8	536.40	77,709.15
11/20/15	6785883	Address letter and response to same re Zhao and Ally matters, call with Receiver re same (.8).	Zaro, David R.	0.8	536.40	78,245.55
11/20/15	6708377	Communications with Receiver and A. Juroe re contact with W. Liu and follow up communications with counsel for W. Liu (.5); communications with SEC's counsel re USFIA Singapore entity, review information provided by SEC counsel, and discuss same and further investigation with A. Juroe (.9); discuss issues relating to Bird Marella and Wellman retainers with Receiver (.2).	Fates, Edward G.	1.6	777.60	79,023.15
11/20/15	6708906	Discuss additional bank records	Fates, Edward G.	0.8	388.80	79,411.95

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		received and potential new document subpoena to Porsche dealer with A. Juroe (.5); discuss issues relating to impound of Chen Mercedes with Receiver (.1); work on subpoena relating to Ally account at Chase (.2).				
11/20/15	6785885	Confer with SEC's counsel re Li Zhao/Ally Investors issues and possible resolution of same (.3); communications with counsel for Zhao/Ally (.2); review and send supplemental Bank of America account records to SEC's counsel and counsel for Zhao/Ally (.2); review new letter from counsel for Zhao/Ally and work on response to same (.3).	Fates, Edward G.	1.0	486.00	79,897.95
11/20/15	6714628	Review production of records from Newsparkle and provide email summarizing production for Receiver's staff (0.5); Review records and search public information for Porsche of Downtown and prepare draft subpoena (0.6); Correspondences with Receiver's staff re additional information needed for subpoena to Chase (0.3); Call with Chase re subpoena for records (0.4); Correspondence with Receiver's staff re initial report (0.1); Prepare order for records for USFIA Singapore (0.4); Correspondences with BofA re production of records (0.5); Review all outstanding responses to subpoenas and demand letters and update tracking log (0.5).	Hsu, Tim	3.3	1,247.40	81,145.35
11/20/15	6716101	Examine case filings in Gucci	Griffin, Peter	2.1	585.90	81,731.25

03/09/16 09:24:27 PROFORMA STATEMENT FOR MATTER 375323-00003 (Asset Investigation & Recovery) 375323-00003

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		America, Inc., et al. v. Weixing Li, et al. to develop roadmap for compelling foreign banks to produce account information				
11/23/15	6712432	Call with Receiver related to subpoenas issues to banks (.4). Review of documents and accounting records as to affiliated entities, address/call re attachments issues and fraudulent conveyance claims (.8).	Zaro, David R.	1.2	804.60	82,535.85
11/23/15	6709690	Work on document subpoena related to Ally purchase of Porsche (.2); follow up communications to counsel for W. Liu (.1).	Fates, Edward G.	0.3	145.80	82,681.65
11/23/15	6787044	Forward L. Zhao/Ally/M. Chen objections to document subpoenas to SEC's counsel (.1); meet and confer calls with SEC's counsel and counsel for Zhao/Ally/M. Chen re objections to subpoena and request to unfreeze funds (1.2); discuss same with Receiver (.2).	Fates, Edward G.	1.5	729.00	83,410.65
11/23/15	6714590	Gather and prepare documents for service of subpoena to Porsche of Downtown (0.3); Call with Chase re subpoena for records (0.6); Prepare and send fax to Chase with revision to subpoena as requested (0.5).	Hsu, Tim	1.4	529.20	83,939.85
11/24/15	6711793	Prepare letter to Zhao/Ally/M. Chen's counsel re objections to document subpoenas and related issues and finalize and send same (2.1); review records relating Zhao/Ally credit card transactions (.3).	Fates, Edward G.	2.4	1,166.40	85,106.25

03/09/16 09:24:27 PROFORMA STATEMENT FOR MATTER 375323-00003 (Asset Investigation & Recovery) 375323-00003

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
11/24/15	6785890	Review documentation relating to USFIA Singapore and send same to SEC's counsel (.4).	Fates, Edward G.	0.4	194.40	85,300.65
11/24/15	6714539	Incorporate revisions to motion for order in aid based on Receiver's findings and prepare draft declaration and proposed order in support (4.2); Review issues for USFIA affiliated operations in Vietnam and possibly Singapore (0.4); Review production of records from BofA and correspondence to Receiver's staff re the same (0.3); Correspondence with Receiver re HK entity Tongyi (0.3); Review report on USFIA Singapore and provide update to counsel re the same (0.7).	Hsu, Tim	5.9	2,230.20	87,530.85
11/25/15	6712822	Address the subpoena for records from overseas offices (.4).	Zaro, David R.	0.4	268.20	87,799.05
11/25/15	6712053	Work to gather information on L. Zhao/Ally Investors and potential related entities in Hong Kong.	Fates, Edward G.	0.5	243.00	88,042.05
11/25/15	6712147	Draft letter to Bird Marella firm re USFIA Singapore and turnover of retainer funds (.8).	Fates, Edward G.	0.8	388.80	88,430.85
11/25/15	6714493	Draft and send letter and email to Wellman re retainer paid to firm by Singapore affiliate (0.6); Retrieve and review public records for Xiangxin Electronic and Jet Profit and provide summary to Receiver and staff re the same (1.3).	Hsu, Tim	1.9	718.20	89,149.05
11/29/15	6713577	Review/evaluate the issues/emails re Singapore Ltd (.4).	Zaro, David R.	0.4	268.20	89,417.25

03/09/16 09:24:27 PROFORMA STATEMENT FOR MATTER 375323-00003 (Asset Investigation & Recovery) 375323-00003

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
11/29/15	6713348	Review correspondence from counsel in Singapore re USFIA Singapore status.	Fates, Edward G.	0.2	97.20	89,514.45
11/30/15	6715186	Discuss letter from HSBC Bank re closed accounts with SEC's counsel and review and forward same to Receiver.	Fates, Edward G.	0.2	97.20	89,611.65
11/30/15	6714933	Research issue iso opposition to motion to intervene and correspondence with counsel re the same (1.1); Call and emails with BofA representative re outstanding subpoena responses (0.3); Review records produced by BofA and forward the same to Receiver and staff (0.5); Review opposition briefing filed by SEC to motion to intervene (0.3); Calls and email with Chase representative re subpoena and anticipated production of records in response (0.5); Revise and update tracking schedule for subpoenas and demand letters sent (0.7).	Hsu, Tim	2.3	869.40	90,481.05
12/01/15	6717880	Follow-up on discovery as to Ally Investors, investigation of relationship of affiliated entities (.8). Call re USFIA Singapore, advice to Receiver re same (.3). Several emails re protective order, call with counsel and advice as to recovery of retainers (.6).	Zaro, David R.	1.7	1,139.85	91,620.90
12/01/15	6717884	Calls with Receiver and counsel to address scope of accounting, third party subpoenas and approach to locating investors (.4). Review of and research discovery approach re	Zaro, David R.	1.1	737.55	92,358.45

03/09/16 09:24:27 PROFORMA STATEMENT FOR MATTER 375323-00003 (Asset Investigation & Recovery) 375323-00003

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		overseas lenders, advice to counsel (.4). Advice re email discovery (.3).				
12/01/15	6716843	Review communications from Singapore attorney addressing USFIA Singapore affiliation and related issues (.2); prepare response to same (.7); calls and emails to Bird Marella firm re USFIA Singapore, affiliate status, and retainer issue (1.1); advise re Wellman affiliate and retainer issues (.3).	Fates, Edward G.	2.3	1,117.80	93,476.25
12/01/15	6716853	Review and respond to communications from counsel for Zhao/Ally re subpoenas, document production, proposed protective order, and bank records received from Bank of America (.9); confer with SEC's counsel re same (.3).	Fates, Edward G.	1.2	583.20	94,059.45
12/01/15	6742388	Correspondence to counsel for Li Zhao and Ally Investors to provide copies of bank records previously received in response to subpoenas (0.2); Call and email with D.VanSambeek re demand for turnover of receivership funds (0.6).	Hsu, Tim	0.8	302.40	94,361.85
12/02/15	6719164	Review/analysis of legal issues related to Singapore entities, recovery of funds deposited for the benefit of S. Chen per correspondence/loan evidence (.7).	Zaro, David R.	0.7	469.35	94,831.20
12/02/15	6717228	Review further communications and attachments from counsel in Singapore re USFIA Singapore affiliate status (.2); follow up communications with Wellman firm re	Fates, Edward G.	0.4	194.40	95,025.60

03/09/16 09:24:27 PROFORMA STATEMENT FOR MATTER 375323-00003 (Asset Investigation & Recovery) 375323-00003

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		retainer balance and freeze of funds (.2).				
12/02/15	6718087	Call with Bird Marella re USFIA Singapore affiliate and retainer issue.	Fates, Edward G.	0.4	194.40	95,220.00
12/03/15	6721122	Call with Receiver concerning the recovery of assets held by affiliated entities/real property issues (.3); Review of title report and documents related to the real property assets (.4).	Zaro, David R.	0.7	469.35	95,689.35
12/04/15	6721366	Review and evaluate issues related to Wells Fargo accounts as to affiliates and turnover issues (.3); Follow-up to review the documents and records re Steamfont and address turnover and control issues (.6); Emails related to Long Lui and declarations concerning the Zhao and Ally accounting (.3).	Zaro, David R.	1.2	804.60	96,493.95
12/04/15	6720216	Communications with Bird Marella re USFIA Singapore and retainer issue (.2).	Fates, Edward G.	0.2	97.20	96,591.15
12/04/15	6785966	Review records produced by Porsche of Downtown and correspondence to Receiver's staff re the same (0.3).	Hsu, Tim	0.3	113.40	96,704.55
12/07/15	6722562	Several emails/call re Ally/Zhao as to discovery dispute, advice to counsel re privilege issues (.4).	Zaro, David R.	0.4	268.20	96,972.75
12/07/15	6720799	Communications with Bird Marella re USFIA Singapore, possible agreement to turn over retainer funds, and issue of pre-receivership fees (.3); emails and call from escrow company re San Gabriel property and discuss same with A. Juroe (.5).	Fates, Edward G.	0.8	388.80	97,361.55

03/09/16 09:24:27 PROFORMA STATEMENT FOR MATTER 375323-00003 (Asset Investigation & Recovery) 375323-00003

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
12/08/15	6785967	Address issues related to Amkey Global, possible operations/recovery (.6).	Zaro, David R.	0.6	402.30	97,763.85
12/08/15	6785968	Communications with Bird Marella re USFIA Singapore issues (.2); advise of issues re Wellman & Warren retainer and USFIA Singapore issues (.2); email exchange with SEC's counsel re Chase bank records (.2).	Fates, Edward G.	0.6	291.60	98,055.45
12/08/15	6742361	Review record provided by Kuwada and forward the same to Receiver's staff (0.4); Call and email with D.VanSambeek re demand for return of receivership funds (0.6).	Hsu, Tim	1.0	378.00	98,433.45
12/09/15	6724487	Communications with SEC's counsel re records for Amkey account.	Fates, Edward G.	0.2	97.20	98,530.65
12/10/15	6727345	Follow-up on Amkey Global and further analysis of the Receiver's option to realize value, follow-up with Receiver re same (.4).	Zaro, David R.	0.4	268.20	98,798.85
12/10/15	6785972	Communications with A. Juroe and escrow officer re sale of property owned by Grace He and preliminary injunction order (.7).	Fates, Edward G.	0.7	340.20	99,139.05
12/10/15	6742347	Review property tax bills for receivership property and forward the same to Receiver's staff for processing (0.4).	Hsu, Tim	0.4	151.20	99,290.25
12/11/15	6727284	Review correspondence from Wellman firm re USFIA Singapore and retainer issue and initial work on motion to compel turnover of funds.	Fates, Edward G.	0.3	145.80	99,436.05
12/11/15	6742341	Correspondences with Wellman &	Hsu, Tim	0.7	264.60	99,700.65

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		Warren re return of receivership funds (0.4); Review response from W&W and response from counsel for USFIA Singapore (0.3).				
12/14/15	6731313	Call with FBI re turnover of seized funds (.2). Call with Receiver, email re seized funds (.2). Work on the report/form for turnover of funds, emails re same to FBI/DOJ and Receiver (.6).	Zaro, David R.	1.0	670.50	100,371.15
12/14/15	6728224	Calls and emails with counsel for G. He re sale of La Presa property, documentation relating to property, securing of net sale proceeds, and related issues (.5); review Bird Marella bills and discuss retainer issue with Receiver and SEC's counsel (.4); call with counsel for W. Liu and advise Receiver re same (.3).	Fates, Edward G.	1.2	583.20	100,954.35
12/15/15	6742326	Review production of records from Chase and correspondence with Receiver's staff re the same (0.3).	Hsu, Tim	0.3	113.40	101,067.75
12/16/15	6785976	Emails concerning Amkey Global, legal issues and confer with Receiver/counsel re meeting/approach (.6). Further call with Receiver to follow-up on Amkey Global (.2). Work on response as to Amkey Global (.4).	Zaro, David R.	1.2	804.60	101,872.35
12/16/15	6730522	Communications with SEC's counsel and Bird Marella re turnover of retainer funds (.4).	Fates, Edward G.	0.4	194.40	102,066.75
12/17/15	6731727	Communications with Lotus Escrow re sale of G. He property (.2).	Fates, Edward G.	0.2	97.20	102,163.95

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
12/17/15	6742312	Correspondences with Receiver's staff re status of outstanding subpoenas and need for additional mortgage information (0.4).	Hsu, Tim	0.4	151.20	102,315.15
12/17/15	6744123	Critical research and analysis re the scope of allowable discovery for a Receiver's subpoena to a non-party.	Griffin, Peter	3.0	837.00	103,152.15
12/18/15	6735901	Respond to AUSA's request for information, document issues, attorney-client privilege (.2). Review of the Arch of Record letter/claims and analysis re claims and issues (.4).	Zaro, David R.	0.6	402.30	103,554.45
12/18/15	6733341	Review email from former employee re potential USFIA operation in Dubai and advise Receiver re same.	Fates, Edward G.	0.3	145.80	103,700.25
12/18/15	6785996	Prepare and send additional subpoenas to East West Bank and BofA (0.5); Correspondences with Receiver's staff re production by Chase and need for additional subpoenas (0.3).	Hsu, Tim	0.8	302.40	104,002.65
12/21/15	6734612	Call with Bird Marella firm re W9 issue for transfer of retainer balance and call to Receiver re same (.4).	Fates, Edward G.	0.4	194.40	104,197.05
12/22/15	6737220	Call with Receiver to address the issues related to the investor identities/accounting and development of same and also advise as to reporting issues (.4); Follow-up on Receiver call to address documents/subpoenas to obtain further bank records (.3).	Zaro, David R.	0.7	469.35	104,666.40

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
12/22/15	6737278	Call with Receiver related to Amkey Global meeting with counsel for Mo Chen/advise re same (.3); Review/evaluate document production from Mr. Chen as to Amkey Global/follow-up thereon (1.2); Call with receiver related to Amkey Global docs, meeting with counsel/next steps (.4).	Zaro, David R.	1.9	1,273.95	105,940.35
12/22/15	6736252	Communications with Bird Marella and Receiver re receipt of wire transfer.	Fates, Edward G.	0.3	145.80	106,086.15
12/22/15	6736903	Retrieve and review records for provided by T.Zaccaro (0.7); Prepare the same for delivery to Receiver and staff (0.2).	Hsu, Tim	0.9	340.20	106,426.35
12/23/15	6740581	Address issues related to discovery, meet/confer with counsel as to Zhao/Ally (.3). Emails related to meeting with counsel (.3).	Zaro, David R.	0.6	402.30	106,828.65
12/23/15	6737565	Call from broker for G. He re pending property sale and call with new counsel for G. He re same and W. Liu (.5); discuss G. He and W. Liu issues with Receiver (.2).	Fates, Edward G.	0.7	340.20	107,168.85
12/23/15	6742303	Prepare subpoena to Grace (Wei) He c/o Robert Hsu (0.4).	Hsu, Tim	0.4	151.20	107,320.05
12/28/15	6738693	Work on joint discovery stipulation re Zhao/Ally subpoenas (.2); review documents concerning purchase/leasing/management of Gainsborough property and potential new subpoenas re same (.4).	Fates, Edward G.	0.6	291.60	107,611.65

03/09/16 09:24:27 PROFORMA STATEMENT FOR MATTER 375323-00003 (Asset Investigation & Recovery) 375323-00003

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
12/29/15	6739625	Work on subpoenas to escrow, title, broker, and vendors related to Gainsborough property (.3); work on subpoenas relating to Gainsborough property (.2).	Fates, Edward G.	0.5	243.00	107,854.65
12/29/15	6742290	Research information for entities to be subpoenaed (0.5); Prepare subpoenas for Title365, IRN Realty, and Mathis Bros. re Gainsborough property (0.8); Calls and correspondences with BofA re outstanding subpoena for mortgage records (0.6).	Hsu, Tim	1.9	718.20	108,572.85
12/30/15	6741625	Discovery as to bank accounts, follow-up as to additional subpoena (.3). Review status of accounting/investor data, address issues re data/emails and investor list/contact date, conference with Receiver as to alternatives to obtaining information (.5).	Zaro, David R.	0.8	536.40	109,109.25
12/30/15	6741635	Review/evaluate the documents from AUSA/FBI as to USFIA/counsel's communications (.7).	Zaro, David R.	0.7	469.35	109,578.60
12/30/15	6742288	Finalize and send subpoenas for service re Gainsborough property and Mathis furniture store (0.2).	Hsu, Tim	0.2	75.60	109,654.20

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David R. Zaro	58.8	670.50	39,425.40
000820	John T. Kaup	2.8	229.50	642.60
001665	Edward G. Fates	51.2	486.00	24,883.20
002055	Tim Hsu	112.8	378.00	42,638.40

03/09/16 09:24:27 PROFORMA STATEMENT FOR MATTER 375323-00003 (Asset Investigation & Recovery) 375323-00003

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
002209	Peter Griffin	7.4	279.00	2,064.60
		<hr/> 233.0		<hr/> 109,654.20
Total Fees				109,654.20
Total Disbursements				0.00

03/09/16 10:03:09 PROFORMA STATEMENT FOR MATTER 375323-00004 (Reporting) 375323-00004

Preliminary Billing Form

Billing Atty: 000313 - Zaro

Matter #: 375323-00004

Matter Name: Reporting

Date of Last Billing:

Client Name: Seaman, Thomas A./Receiver for US Fine Investment Arts Inc

Proforma Number 1257789

Client/Matter Joint Group # 375323-1

Fees for Matter 375323-00004 (Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
10/08/15	6670814	Email related to inventory/reporting (.3).	Zaro, David R.	0.3	201.15	201.15
10/12/15	6671391	Conference call re priority investigation tasks, initial report to court, motion for order in aid of receivership, and related items (1.5); work on motion for order in aid of receivership (.4); communications with SEC counsel re matters relating to S. Chen and counsel (.2).	Fates, Edward G.	2.1	1,020.60	1,221.75
10/13/15	6671745	Work on Receiver's first interim report (2.4); call with SEC counsel re S. Chen counsel/communications re same (.2); communications with S. Chen counsel (.3); discuss outstanding investigation items with Receiver and A. Juroe (.8).	Fates, Edward G.	3.7	1,798.20	3,019.95
10/14/15	6674987	Call with Receiver and counsel re scope of Report/Accounting (.4).	Zaro, David R.	0.4	268.20	3,288.15
10/14/15	6672857	Continue work on Receiver's first interim report, table of outstanding tasks, discuss same with Receiver (2.4).	Fates, Edward G.	2.4	1,166.40	4,454.55
10/20/15	6679709	Call with the SEC related to case	Zaro, David R.	0.3	201.15	4,655.70

03/09/16 10:03:09 PROFORMA STATEMENT FOR MATTER 375323-00004 (Reporting) 375323-00004

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		status (.3).				
10/29/15	6685781	Work on Receiver's First Interim Report and discuss same with Receiver (.8).	Fates, Edward G.	0.8	388.80	5,044.50
11/11/15	6702783	Review of the draft of Receiver report, call with Receiver re same (.4). Call to Receiver re advice as to report, accounting, discovery re Google accounts (.2).	Zaro, David R.	0.6	402.30	5,446.80
11/11/15	6701397	Work on Receiver's First Interim Report and discuss same with Receiver.	Fates, Edward G.	2.2	1,069.20	6,516.00
11/12/15	6705466	Review accounting information and revisions to report, follow-up advice to Receiver (.6).	Zaro, David R.	0.6	402.30	6,918.30
11/12/15	6702454	Work on Receiver's First Interim Report.	Fates, Edward G.	0.8	388.80	7,307.10
11/13/15	6705579	Follow-up/revise draft of Receiver's report (.6). Call with Receiver re report and accounting (.2).	Zaro, David R.	0.8	536.40	7,843.50
11/13/15	6702478	Draft and revise Receiver's First Interim Report and discuss report and financial exhibits with Receiver (2.9); discuss report with SEC's counsel (.4).	Fates, Edward G.	3.3	1,603.80	9,447.30
12/03/15	6721128	Call related to report and accounting with Receiver as to timeframe/data issues (.3); Review of investor data including email and accounting records to substantiate accounting (.2); Call with SEC related to accounting timeline (.2).	Zaro, David R.	0.7	469.35	9,916.65

03/09/16 10:03:09 PROFORMA STATEMENT FOR MATTER 375323-00004 (Reporting) 375323-00004

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David R. Zaro	3.7	670.50	2,480.85
001665	Edward G. Fates	15.3	486.00	7,435.80
		<hr/> 19.0		<hr/> 9,916.65
Total Fees				9,916.65
Total Disbursements				0.00

03/10/16 11:13:01 PROFORMA STATEMENT FOR MATTER 375323-00005 (Investor Communications) 375323-00005

Preliminary Billing Form

Billing Atty: 000313 - Zaro

Matter #: 375323-00005

Matter Name: Investor Communications

Date of Last Billing:

Client Name: Seaman, Thomas A./Receiver for US Fine Investment Arts Inc

Proforma Number 1257790

Client/Matter Joint Group # 375323-1

Fees for Matter 375323-00005 (Investor Communications)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
09/30/15	6660511	Work on translation issues for receivership website.	Fates, Edward G.	0.2	97.20	97.20
10/14/15	6673007	Communications with Receiver re additions to receivership website.	Fates, Edward G.	0.2	97.20	194.40
12/01/15	6716942	Discuss investor database and notice issues with Receiver.	Fates, Edward G.	0.2	97.20	291.60
12/02/15	6742385	Call and correspondence from USFIA investor in France, and correspondence to Receiver's staff to provide update re the same (0.5).	Hsu, Tim	0.5	189.00	480.60
12/07/15	6721716	Review and forward investor communication to A. Juroe.	Fates, Edward G.	0.1	48.60	529.20

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Edward G. Fates	0.7	486.00	340.20
002055	Tim Hsu	0.5	378.00	189.00
		<u>1.2</u>		<u>529.20</u>
Total Fees				529.20
Total Disbursements				0.00

03/10/16 11:14:52 PROFORMA STATEMENT FOR MATTER 375323-00006 (Sale of Assets/Disposition) 375323-00006

Preliminary Billing Form

Billing Atty: 000313 - Zaro

Matter #: 375323-00006

Matter Name: Sale of Assets/Disposition

Date of Last Billing:

Client Name: Seaman, Thomas A./Receiver for US Fine Investment Arts Inc

Proforma Number 1257911

Client/Matter Joint Group # 375323-1

Fees for Matter 375323-00006 (Sale of Assets/Disposition)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
10/01/15	6667011	Work with Receiver on issues re hotel operations, employee issues/insurance (.4).	Zaro, David R.	0.4	268.20	268.20
10/15/15	6677140	Call with Receiver concerning insurance coverage and policies (.4). Review documents concerning insurance coverage (.5).	Zaro, David R.	0.9	603.45	871.65
10/16/15	6676810	Discuss lease termination for tenant at USFIA office building with Receiver and review lease and termination terms.	Fates, Edward G.	0.2	97.20	968.85
10/19/15	6676807	Work on lease termination for tenant as USFIA office building.	Fates, Edward G.	0.8	388.80	1,357.65
10/19/15	6676828	Prepare Lease Termination Agreement for Tracy H. Jaffe at 135 E. Live Oak, Arcadia CA.	Lorenzen, Jonathan	2.1	793.80	2,151.45

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David R. Zaro	1.3	670.50	871.65
001665	Edward G. Fates	1.0	486.00	486.00
002115	Jonathan Lorenzen	2.1	378.00	793.80
		<u>4.4</u>		<u>2,151.45</u>

03/10/16 11:14:52 PROFORMA STATEMENT FOR MATTER 375323-00006 (Sale of Assets/Disposition) 375323-00006

Total Fees	2,151.45
Total Disbursements	0.00

03/09/16 09:24:27 PROFORMA STATEMENT FOR MATTER 375323-00007 (Pending Litigation) 375323-00007

Preliminary Billing Form

Billing Atty: 000313 - Zaro

Matter #: 375323-00007

Matter Name: Pending Litigation

Date of Last Billing:

Client Name: Seaman, Thomas A./Receiver for US Fine Investment Arts Inc

Proforma Number 1257791

Client/Matter Joint Group # 375323-1

Fees for Matter 375323-00007 (Pending Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
10/02/15	6799840	Call with Wellman & Warren re pending litigation (.3).	Zaro, David R.	0.3	201.15	201.15
10/05/15	6667321	Review/evaluate complaint from Jason Ning, Michael/Yin Hua Lu lawsuits and exhibits (1.0). Call with counsel for plaintiffs as to the action/stay (.4). Address class action claims by counsel and assess the next steps (.5).	Zaro, David R.	1.9	1,273.95	1,475.10
10/05/15	6799842	Assess the description of assets in filings by Ning and Lui, then review the SEC filings/exhibits and correlate asset list/descriptions and address inventory (1.7).	Zaro, David R.	1.7	1,139.85	2,614.95
10/06/15	6667385	(Ning v. Chen) Call with Receiver re third party claims by Ning/Liu, etc (.4). Work on draft letter to counsel for Ning/Liu parties (.7).	Zaro, David R.	1.1	737.55	3,352.50
10/07/15	6668640	Revise court filings in the Ning v. Chen action, address substitution of attorney (.4). Call/email with Receiver related to class action and revise letter (.4).	Zaro, David R.	0.8	536.40	3,888.90
10/09/15	6670912	Call/emails related to the third party	Zaro, David R.	0.7	469.35	4,358.25

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		action filed as class action against entities (.3). Review of the complaint and advice to Receiver related to same/dismissal as to entities (.4).				
10/14/15	6675014	Letter from counsel for alleged class of investor and call with Receiver as to response to the same (.3). Draft letter to counsel for class claimants (.4).	Zaro, David R.	0.7	469.35	4,827.60
10/14/15	6673550	Analyze information re pending state court lawsuit against receivership entities and others by investor group.	Fates, Edward G.	0.2	97.20	4,924.80
10/16/15	6677154	Work on letter response to counsel for class claimants, follow-up to address approach/coordination and stay (.4).	Zaro, David R.	0.4	268.20	5,193.00
10/19/15	6678169	Call/email with Receiver related to Ning claims and litigation (.3). Email with prior counsel/Receiver related to Ning cross-claim for recovery of commissions/transfers (.4).	Zaro, David R.	0.7	469.35	5,662.35
10/27/15	6683358	Advise re litigation stay issue for pending action filed by attorney L. Liu.	Fates, Edward G.	0.1	48.60	5,710.95
10/27/15	6688287	Call and correspondences with counsel for class action matter re stay of lawsuit and appointment of receiver (0.6).	Hsu, Tim	0.6	226.80	5,937.75
10/30/15	6688321	Correspondences with Atty Liu re pending class action lawsuit and need for notice to court re receivership (0.2); Review proposed draft notice to be files by Atty Liu and provide redline comments to draft of the same (0.5).	Hsu, Tim	0.7	264.60	6,202.35

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
10/31/15	6688232	Revise notice of receivership to be filed in pending superior court class action matter.	Fates, Edward G.	0.2	97.20	6,299.55
11/01/15	6714900	Revise draft notice of receivership for state-court class action and correspondence to class-action counsel L.Liu re the same (0.7).	Hsu, Tim	0.7	264.60	6,564.15
11/02/15	6714890	Correspondence with L.Liu re filing of notice of receivership in state-court class action (0.2).	Hsu, Tim	0.2	75.60	6,639.75
11/13/15	6703488	Correspondences with L.Liu re pending third party litigation and filing of notice of receivership (0.2).	Hsu, Tim	0.2	75.60	6,715.35
12/01/15	6742389	Review court docket for filing of notice of receivership in class action and correspondences and calls with counsel for class representatives re the same (0.6).	Hsu, Tim	0.6	226.80	6,942.15
12/03/15	6742382	Review conformed copies of filing of notice of receivership by L.Liu in class action lawsuit and correspondence with office of L.Liu re the same (0.3).	Hsu, Tim	0.3	113.40	7,055.55

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David R. Zaro	8.3	670.50	5,565.15
001665	Edward G. Fates	0.5	486.00	243.00
002055	Tim Hsu	3.3	378.00	1,247.40
		<u>12.1</u>		<u>7,055.55</u>
Total Fees				7,055.55
Total Disbursements				0.00

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Preliminary Billing Form

Billing Atty: 000313 - Zaro

Matter #: 375323-00009

Matter Name: Third Party Claims

Date of Last Billing:

Client Name: Seaman, Thomas A./Receiver for US Fine Investment Arts Inc

Proforma Number 1257792

Client/Matter Joint Group # 375323-1

Fees for Matter 375323-00009 (Third Party Claims)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
10/30/15	6786054	Analyze issues re freeze of Zhao/Ally accounts, fraudulent transfers to accounts, and subpoena for records, and discuss same with Receiver (.9).	Fates, Edward G.	0.9	437.40	437.40
10/31/15	6688255	Compile information and draft Receiver's declaration re Zhao/Ally relationship, transfers, accounts, and related issues.	Fates, Edward G.	1.8	874.80	1,312.20
11/04/15	6694143	Discuss information relating to Zhao/Ally accounts with A. Juroe and finalize and send letter re same to Bank of America (.8); discuss potential fraudulent transfers relating to Ahome with A. Juroe (.3); review communication from counsel for Zhao/Ally and discuss same with Receiver and assess fraudulent conveyance cause of action (.3).	Fates, Edward G.	1.4	680.40	1,992.60
11/09/15	6697845	Analyze issues and work on complaint against Ally Investors and Li Zhao and motion for attachment/freeze.	Fates, Edward G.	0.9	437.40	2,430.00
11/10/15	6786075	Email communications with counsel for Zhao/Ally and SEC's counsel re	Fates, Edward G.	0.2	97.20	2,527.20

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		meet and confer (.2).				
11/10/15	6787009	Prepare draft disgorgement complaint against Ally Investors and Zhao (3.6); Review procedures for preparation of application for writ of attachment and provide update to counsel re the same (0.8).	Hsu, Tim	4.4	1,663.20	4,190.40
11/11/15	6787010	Address Zhao/Ally strategy and draft of fraudulent conveyance complaint, advise to counsel re same (.5).	Zaro, David R.	0.5	335.25	4,525.65
11/11/15	6700237	Work on fraudulent transfer complaint against Zhao/Ally investors and discuss same with Receiver as well as November 12 meet and confer with SEC and Zhao/Ally's counsel.	Fates, Edward G.	1.8	874.80	5,400.45
11/11/15	6785816	Revise draft complaint against Ally Investors and Li Zhao (1.2).	Hsu, Tim	1.2	453.60	5,854.05
11/12/15	6705460	Review/evaluate the draft fraudulent conveyance complaint, advice/revisions re same (.8). Address issues re Ally/fraud and commingling of assets with Receiver (.4). Review further issues with Receiver/SEC and counsel to prepare for meet/confer per demand by Zacarro (.5).	Zaro, David R.	1.7	1,139.85	6,993.90
11/12/15	6702421	Confer with SEC's counsel re Zhao/Ally account freeze, fraudulent transfer complaint, and related issues (.8); conferences re same and facts relating to accounts with Receiver and A. Juroe (1.3); participate in meet and confer with Zhao/Ally's counsel and SEC's counsel (2.1); work on complaint and related motion re	Fates, Edward G.	6.9	3,353.40	10,347.30

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		account freeze (2.7).				
11/12/15	6785825	Confer with counsel re status of meet and confer with counsel for Ally Investors and Li Zhao re frozen accounts (0.3); Revise draft complaint against Ally Investors and Li Zhao (2.4).	Hsu, Tim	2.7	1,020.60	11,367.90
11/13/15	6785837	Work with counsel and Receiver re Ally matter (.4). Work on the fraudulent conveyance claims, follow-up research as to the claims (.7).	Zaro, David R.	1.1	737.55	12,105.45
11/13/15	6785847	Attention to issues re possible complaint and application for writ against Ally Investors and Li Zhao (0.6).	Hsu, Tim	0.6	226.80	12,332.25
11/24/15	6712724	Review of motion to intervene, address claims of Zhao/Ally to accounts/funds (.8). Work on preparation of evidence to support the Receiver's opposition (.7). Call with Receiver related to the same (.2).	Zaro, David R.	1.7	1,139.85	13,472.10
11/24/15	6711028	Review and analyze motion to unfreeze Zhao/Ally accounts and supporting declarations and discuss same with Receiver (.5); work on opposition to motion and discuss same with SEC's counsel (.7).	Fates, Edward G.	1.2	583.20	14,055.30
11/25/15	6712817	Review Zacarro declaration/exhibits, assess response to same (.6). Review emails/documents, draft Zaro declaration re motion as to ally accounts (1.6). Revise Zaro declaration (.4). Call with counsel re Seaman declaration (.3).	Zaro, David R.	2.9	1,944.45	15,999.75

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
11/25/15	6785930	Work on opposition to Zhao/Ally motion to intervene/unfreeze accounts and Receiver's declaration in support of same (3.4); further correspondence with counsel for Zhao/Ally re hearing/briefing schedule for motion and responses to subpoenas (.3); discuss Zhao/Ally issues with SEC's counsel (.2).	Fates, Edward G.	3.9	1,895.40	17,895.15
11/28/15	6714441	Research issues and prepare draft briefing re affiliate status in connection with opposition to motion to intervene by Ally and Li Zhao (2.6).	Hsu, Tim	2.6	982.80	18,877.95
11/29/15	6785933	Review of David Zaro and Tom Seaman draft declarations, revise same (2.2). Call with Receiver to address the same (.4). Emails related to draft declarations (.3).	Zaro, David R.	2.9	1,944.45	20,822.40
11/29/15	6713365	Work on opposition to Zhao/Ally motion to intervene/unfreeze accounts.	Fates, Edward G.	0.6	291.60	21,114.00
11/30/15	6716729	Review declaration related to Ally/Zhao motion (.4). Call with Receiver concerning the declaration/evidence (.4). Work on revisions to Zaro declaration (.7). Revise draft Seaman declaration and follow-up on exhibits to same (.8). Revise/revise Fates declaration (.4).	Zaro, David R.	3.4	2,279.70	23,393.70
11/30/15	6714668	Work on opposition to Zhao/Ally motion to intervene/recover funds/clarify orders and supporting declarations of Receiver, D. Zaro and T. Fates (9.7); discuss declaration with Receiver (.7); confer with SEC's	Fates, Edward G.	10.8	5,248.80	28,642.50

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		counsel (.4).				
12/03/15	6718428	Analyze issues re Zhao/Ally subpoenas, request for protective order, and potential motion to compel.	Fates, Edward G.	0.3	145.80	28,788.30
12/04/15	6785965	Call with counsel for Zhao/Ally re protective order (.2); call with SEC counsel re same (.2); review proposed declaration from Attorney L. Liu re Zhao/Ally issues (.3).	Fates, Edward G.	0.7	340.20	29,128.50
12/04/15	6742373	Review declarations provided by L.Liu (0.2); Correspondences with L.Liu re pending motion to intervene by Li Zhao and Ally Investors (0.2).	Hsu, Tim	0.4	151.20	29,279.70
12/08/15	6724483	Review/evaluate the briefs/declarations in reply to SEC and Receiver's opposition to Zhao/Ally motion to intervene/turnover assets (.8). Call with Receiver related to the Ally/Zhao funds (.4).	Zaro, David R.	1.2	804.60	30,084.30
12/08/15	6722330	Review and analyze Zhao/Ally reply to SEC's opposition, reply to Receiver's opposition, declarations, and exhibits (1.3); work on motion to compel production of documents by Zhao (.6); communications with SEC's counsel and Zhao/Ally's counsel re protective order, subpoena, and document production (.4).	Fates, Edward G.	2.3	1,117.80	31,202.10
12/10/15	6725954	Communications with counsel for Zhao/Ally re scope of subpoenas, responsive documents, and potential motion to compel (.4).	Fates, Edward G.	0.4	194.40	31,396.50

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
12/15/15	6729558	Work on motion to compel production of documents by Zhao/Ally (1.1); communications with Zhao/Ally counsel re motion to compel and pre-motion telephonic conference (.8).	Fates, Edward G.	1.9	923.40	32,319.90
12/15/15	6730432	Draft motion to compel.	Swonetz, Josi	4.2	1,776.60	34,096.50
12/16/15	6732476	Address discovery dispute concerning Zhao /Ally (.3).	Zaro, David R.	0.3	201.15	34,297.65
12/16/15	6785982	Analyze issues raised in meet and confer correspondence from counsel for Zhao/Ally and prepare responses to same (.6); confer with SEC's counsel re hearing on Zhao/Ally motion (.2); review Chase bank records received for Zhao/Ally accounts (.6).	Fates, Edward G.	1.4	680.40	34,978.05
12/16/15	6731372	Revise motion to compel.	Swonetz, Josi	1.9	803.70	35,781.75
12/17/15	6733481	Call with Receiver and counsel re discovery/motion to compel (.4). Review hearing notice, follow-up with counsel/Commission (.1). Review email draft as to discovery dispute for the magistrate and advice re same (.3).	Zaro, David R.	0.8	536.40	36,318.15
12/17/15	6785988	Work on motion to compel Zhao/Ally document production per subpoenas (1.8); prepare email to court re pre-motion telephonic conference (2.3); communications with Zhao/Ally counsel re same (.3); follow up communications with counsel for W. Liu (.1); review order taking hearing on Zhao/Ally motion off calendar and advise Receiver re same (.1).	Fates, Edward G.	4.6	2,235.60	38,553.75

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
12/18/15	6735812	Review email/revise report to Magistrate as to the discovery dispute with Zhao/Ally over documents (.4). Several emails/calls related to notices to magistrate/discovery dispute and next steps (.8).	Zaro, David R.	1.2	804.60	39,358.35
12/18/15	6733338	Work on email to Court chambers re Zhao/Ally subpoenas and pre-motion telephone conference (1.6); follow up communications with chambers re receipt of email, scheduling of call, and self recusal of Magistrate Judge Standish (.3); communications with SEC's counsel and Zhao/Ally counsel re same (.2); discuss potential subpoenas to former employees L. Johnson and W. Zhao with A. Juroe (.2); review and revise subpoenas to banks for additional Zhao/Ally account and mortgage records (.3); review order reassigning case to Magistrate Judge Stevenson, review chamber rules, and communications with courtroom deputy re pre-motion telephone conference (.4); work on motion to compel Zhao/Ally production of documents requested in subpoenas (1.8); review order reassigning case to Magistrate Judge Abrams, review Judge Abrams chamber rules re discovery motions, and communications with counsel for Zhao/Ally re same (.4); review correspondence from Zhao/Ally counsel re management and keys for San Marino property (.1).	Fates, Edward G.	5.3	2,575.80	41,934.15

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
12/18/15	6742309	Correspondence to counsel for Li Zhao/Ally Investors to provide copies of bank records received in response to subpoena (0.3).	Hsu, Tim	0.3	113.40	42,047.55
12/21/15	6736745	Email re Zhao/Ally discovery dispute, next steps (.3).	Zaro, David R.	0.3	201.15	42,248.70
12/21/15	6786004	Review letter from counsel for Zhao/Ally re San Marino property, review pleadings re same, and discuss with Receiver and A. Juroe (.9); work on joint motion re Zhao/Ally failure to produce documents in response to subpoenas (.8); review correspondence from Zhao/Ally re further meet and confer and analyze strategy re same (.4).	Fates, Edward G.	2.1	1,020.60	43,269.30
12/28/15	6738905	Draft joint stipulation re motion to compel.	Swonetz, Josi	3.7	1,565.10	44,834.40
12/30/15	6740231	Revise and finalize joint stipulation re motion to compel and follow up thereon.	Swonetz, Josi	0.9	380.70	45,215.10

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David R. Zaro	18.0	670.50	12,069.00
001665	Edward G. Fates	49.4	486.00	24,008.40
002051	Josi Swonetz	10.7	423.00	4,526.10
002055	Tim Hsu	12.2	378.00	4,611.60
		<u>90.3</u>		<u>45,215.10</u>
Total Fees				45,215.10
Total Disbursements				0.00